

May 1996 Submission

1. March 11, 1996 PCB Management Survey by Jenny Lang. This includes a 1996 Transformer and light ballast disposal to Aptus Co.
2. Real Estate documents obtained from the City of Otsego describing Menasha's Otsego property.
3. A letter from Jenny Lang listing properties owned or rented by Menasha, Otsego.
4. Real Estate documents provided by Glen Holcombe including deeds to Menasha properties.
5. Menasha's document retention policy.

DETROIT 60996-9 734793

Memo

PAPERBOARD DIVISION

 MENASHA CORPORATION

TO: Keith Kling

c. Dave Merkel
Pete DeRossi

FROM: Jenny Lang 

DATE: March 11, 1996

SUBJECT: Transformer - PCB Management Summary

-
- **Currently, there are 41 operational transformers on-site at the Otsego Mill** (see attachment #1).
 - General Electric has provided written guarantees regarding 25 transformers currently on-site and in use at the Otsego Mill (see attachment #2). General Electric guarantees the transformers did not contain PCBs (Polychlorinated Biphenyl) at the time of manufacture. In addition, according to Robert Gulbranson, Engineer, Menasha Corporation, none of the transformers (post-installation) have been serviced in a fashion requiring the interior of the transformer to be handled. Thus, **25 operational transformers at the Otsego Mill do not contain PCBs**. The 25 General Electric transformers are identified in attachment #1 as "GE Guarantee".
 - Dynex Industries collected oil samples from 12 operational transformers on-site at the Otsego Mill. Test results indicate all samples contain < 12 ppm PCBs (see attachment #3). According to the EPA and 40 CFR part 761, **these (12) operational transformers are "non-PCB" transformers (contains less than 50 ppm PCBs)**.
 - The remaining **4 operational transformers on-site at the Otsego Mill are to be tested for PCBs by Dynex Industries no later than July 1, 1996**. These transformers must be de-energized in order to collect samples. Upon receipt of these results (after July 1, 1996) labels will be made (see attachment #4).
 - Dynex Industries has provided a copy of their job procedures as well as their credentials (see attachment #5).
 - There were 6 non-operational transformers on-site at the Mill. Aptus properly disposed of transformer #GE 8685575 (see attachment #6). The 5 remaining, non-PCB transformers (see attachment #6) have been drained and the shells recycled. The oil was tested for the presence of PCBs by Chemical Waste Management prior to being recycled by Diamond Oil.

• Attachment #1

Transformer Serial #	Manufacturer	Location	PCB Status
M 123056A	General Electric	SS I-A, Pulping Sys.	GE Guarantee
M 123056B	General Electric	SS I-B, Pulping Sys.	GE Guarantee
M123057	General Electric	SS II, Chipyard	GE Guarantee
M 123056C	General Electric	SS IV-A, #1 P.M.	GE Guarantee
M 123056D	General Electric	SS IV-B, #1 P.M.	GE Guarantee
M 156993	General Electric	SUB #1, #1 P.M.	GE Guarantee
R277165B	General Electric	SUB #4A, #2 P.M.	GE Guarantee
R277165A	General Electric	SUB #4B, Pulpmill	GE Guarantee
M163435A	General Electric	SUB #6A, 2nd Fiber	GE Guarantee
M163435B	General Electric	SUB #6B, 2nd Fiber	GE Guarantee
M123059	General Electric	SUB #7, Power Plant	GE Guarantee
R274490A	General Electric	SUB #10, Aerators	GE Guarantee
3972875	General Electric	SUB #13, CTS Bldg.	GE Guarantee
3973618	General Electric	SUB #13, CTS Bldg.	GE Guarantee
M123055	General Electric	SUB #15A, #1 P.M.	GE Guarantee
R277639	General Electric	SUB #15B, #1 P.M.	GE Guarantee
M125787B	General Electric	SUB #16A, #1 P.M.	GE Guarantee
M125787A	General Electric	SUB #16A, #1 P.M.	GE Guarantee
R277640A	General Electric	SUB #16B, #1 P.M.	GE Guarantee
M123058	General Electric	SUB #18, Brwn. Stock	GE Guarantee
H881099	General Electric	SS III, Power House	< 2 ppm
G-854179	General Electric	SUB #5, Digester	12 ppm
H886006	General Electric	SUB #9, SLI	6 ppm
B973446	General Electric	SUB #13, CTS Bldg.	July 1, 1996
R274082	General Electric	SUB #16C, #1 P.M.	<2 ppm
364 8423	Allis Chalmers	SUB #11, W Dumper	3 ppm
364 8424	Allis Chalmers	SUB #11, W Dumper	< 2 ppm
364 8427	Allis Chalmers	SUB #11, W Dumper	< 2 ppm
RGJ0404	Square D	SUB #17, Tank Farm	< 2 ppm
PFA 2167-0101	General Electric	SUB #3, Offices	< 2 ppm
25236-1	Pennsylvania	SUB #12, Reclaim	July 1, 1996
25236-2	Pennsylvania	SUB #12, Reclaim	July 1, 1996
25236-3	Pennsylvania	SUB #12, Reclaim	July 1, 1996
73AL 890	Westinghouse	SUB #14, E Dumper	< 2 ppm
74AA14942	Westinghouse	SUB #14, E Dumper	< 2 ppm
74AA14944	Westinghouse	SUB #14, E Dumper	< 2 ppm
M162764A	General Electric	CG-1 (Main Sub.)	GE Guarantee
R273184B	General Electric	CG-2	GE Guarantee
R273184A	General Electric	CG-3	GE Guarantee
R273167A	General Electric	CG-4	GE Guarantee
R277640B	General Electric	SUB #16B, #1 P.M	GE Guarantee

GE Guarantee

Refer to attachment #2.

x < ppm

Test results provided by Dynes Industries, Inc. All samples collected October 18, 1995 (see attachment #3)

July 1, 1996

Transformers must be de-energized in order to collect samples. Current plan for sampling - July 1, 1996

• Attachment #2

MEN03091

PAPERBOARD DIVISION

MENASHA CORPORATION

August 23, 1995

TO: Keith B. Kling

FROM: Mr. David Morgan
 General Electric Corporation
 1223 Fairgrove Church Road
 Internal Box #27
 Hickory, NC 28603

Dear David:

According to our records, Menasha Corporation (Paperboard Division, Otsego Mill) purchased 27 transformers manufactured by General Electric. The serial numbers for the transformers are as follows:

1.	M 123056A	N
2.	M 123056B	N
3.	M123057	N
4.	H881099	I
5.	M 123056C	N
6.	M 123056D	N
7.	M 156993	N
8.	R277165B	N
9.	R277165A	N
10.	G-854179	I
11.	M163435A	N
12.	M163435B	N
13.	M123059	N
14.	H886006	I
15.	R 2774430A	N
16.	3972875	N
17.	3973618	N
18.	B973446	Y
19.	M123055	N
20.	R277639	N
21.	M125787B	N
22.	M125787A	N
23.	R277640B	N
24.	R277640A	N
25.	R274082	I
26.	123058	N
27.	PFA2167-0101	2

Units marked w/ an "N" did not contain PCB's at the time of Manufacture.

Units marked w/ a "2" are not GE Serial numbers, therefore cannot be identified as PCB units or not.

Units marked with a "I" ~~cannot~~ do not have any records. We do not know the PCB content.

I recommend contacting an outside firm to test for PCB's.

Daniel May
 Product Service Engineer.

Otsego Mill
 320 N Farmer St
 PO Box 155
 Otsego MI 49078-0155
 1-616-692-8141
 1-616-692-2060 (Fax)

MEN03092

PAPERBOARD DIVISION**MENASHA CORPORATION**

320 N. Farmer Street • PO Box 155 • Otsego, Michigan 49078

1-616-692-6141
(Fax) 1-616-692-2060**FAX LETTER**DATE: 1/8/96FAX NUMBER: (704) 462-3533TO: Jerry FallsCOMPANY: G.E.FROM: Jenny LangTOTAL PAGES: 1
(INCLUDING THIS PAGE)RETURN FAX TO: JENNY LANG
FROM: JERRY FALLS

COMMENTS: Please indicate your response
in a manner similar to David Morgan's
(see attached) Please fax your response
to me as soon as possible (January 12, 1996).

JENNY: According to our records, transformer M162764
was manufactured in Hickory in 1977 and thus did
NOT contain any detectable PCB at time of
manufacture. If you are concerned about any
potential PCB, I recommend you have this unit tested
for PCB to ensure safe & proper handling, as it could
have been contaminated over the years.

TOOTHMAN'S PRINTING, INC. M-0123

Jenny Lang
01/09/96

JAN-18-96 MON 12:48

MENASHA CORP.

FAX NO. 0100322000

1.01

PAPERBOARD DIVISION



MENASHA CORPORATION

320 N. Farmer Street • PO Box 155 • Oshkosh, Michigan 49078

 1-616-692-6141
 (Fax) 1-616-692-2060

FAX LETTER

DATE

1/8/96

John

FAX NUMBER:

(706) 291-3240

TO:

Lisa Dance

COMPANY:

G.E.

FROM:

Jenny Lang

TOTAL PAGES:

3

(INCLUDING THIS PAGE)

COMMENTS:

Please indicate your response in a manner similar to David Morgan's (see attached). Please fax your response to me as soon as possible (January 12, 1996).

Jenny

1/8/96

3184A+B, 3167A
 did not contain any
 detectable PCB's at the
 time of manufacture.

Thx,

John Nix

TOOTHMAN'S PRINTING, INC. # 8122

 (706) 291-3246
 f-3240

JAN-17-98 WED 11:01

MENASHA CORP.

FAX NO. 6166922060

P. 02

PAPERBOARD DIVISION**MENASHA CORPORATION**

January 17, 1998

John Nix
General Electric Corporation
Product Service

Dear John:

According to our records, Menasha Corporation (Paperboard Division, Otsego Mill) purchased a transformer manufactured by General Electric. The serial number for the transformer is: R274490A

To ensure proper transformer management, PCB (Polychlorinated Biphenyl) content must be known. At this time, our records do not clearly state PCB concentration levels for the transformer previously listed. Please indicate the PCB concentration at the time of manufacture and fax the results to me at (616) 692-2060 by January 19, 1998. If you have any questions regarding this request, please do not hesitate to give me a call (616) 692-6141 (ext. 404).

Sincerely,

Jennifer L. Lang
Jennifer L. Lang

This is a ventilated dry type transformer and contains no detectable PCB's at the time of manufacture.

Thank you,

John D. Nix, P.E.
Product Service Engineer
Medium Transformer

Otsego Mill
330 N. Fernier St.
PO Box 155
Otsego MI 49078-0155
1-616-692-6141
1-616-692-2060 (Fax)

• Attachment #3

DYNEX

DYNEX Industries Inc

INSULATING OIL TEST RESULTSCUSTOMER MENASHA CORPORATION JOB NUMBER Z-51363-4LOCATION OTSEGO, MI SUB./EQUIP. NAME SSIII POWERHOUSE/SUMFG. GENERAL ELECTRIC LIQUID TYPE MINERAL OIL LEAKING? NOS/N: H881099 LIQUID GALLONS 770 LIQUID LEVEL? OKKVA 7500 PHASE 3 PAINT CONDITION? OKPri. V 13800 INDOOR - HAS SAMPLE VALVE? YESSec. V 2400 OUTDOOR X OTHER? -

	DATE	4/25/94	10/30/95		
	SAMPLE NUMBER	4	4		
QUALITY ANALYSIS	ACIDITY-MG-KOH/G	011	.014		
	INTERFACIAL TENSION-DYNE/CM	29.9	31.0		
	DIELECTRIC-KV	33.6	35.0		
	COLOR	1 4	1.3		
	SPECIFIC GRAVITY	878	.880		
	VISUAL	Clear	Clear		
	POWER FACTOR	-	-		
	KARL FISCHER-MOISTURE PPM	7	17		
	PPM PCB	-	<2		
	TEMPERATURE	-	-		
GAS ANALYSIS	HYDROGEN	88	ND		
	OXYGEN	-	8197		
	NITROGEN	80384	34923		
	METHANE	22	15		
	CARBON MONOXIDE	240	173		
	CARBON DIOXIDE	1267	1235		
	ETHANE	21	18		
	ETHYLENE	2	ND		
	ACETYLENE	ND	ND		
	PROPANE	ND	ND		
METAL ANALYSIS	COMBUSTIBLE GASES	353	208		
	TOTAL GAS CONTENT	82004	42561		
	ALUMINUM	-			
	IRON	-			
	ZINC	-			
	COPPER	-			
	LEAD	-			
	SILVER	-			
	TIN	-			

Gas & Metal concentrations are in PPM. (ND=None Detected)

OIL CONDITION THIS ANALYSIS: ACCEPTABLE X QUESTIONABLE _____ UNACCEPTABLE _____COMMENTS/RECOMMENDATIONS: Oil quality OK. Maintain current sampling schedule

SAMPLED BY: C. ARRINGTON

DATE 10/18/95

DYNEX

DYNEX Industries, Inc.

INSULATING OIL TEST RESULTSCUSTOMER MENASHA CORPORATION JOB NUMBER Z-51363-27LOCATION OTSEGO, MI SUB./EQUIP. NAME Sub # 11 West Truck Dumper

MFG: <u>Allis Chalmers</u>	LIQUID TYPE: <u>Mineral Oil</u>	LEAKING? <u>No</u>
S/N: <u>3848423</u>	LIQUID GALLONS: <u>36</u>	LIQUID LEVEL? <u>Good</u>
KVA: <u>100</u>	PHASE: <u>Single</u>	PAINT CONDITION? <u>Good</u>
Pr. V: <u>2400/4160</u>	INDOOR: _____	HAS SAMPLE VALVE? <u>No</u>
Sec V: <u>240/480</u>	OUTDOOR: <u>Yes</u>	OTHER? _____

		DATE	9/8/94	10/30/95	
		SAMPLE NUMBER	27	27	
QUALITY ANALYSIS	ACIDITY-MG-KOH/G		.014	.014	
	INTERFACIAL TENSION-DYNE/CM		33.4	32.3	
	DIELECTRIC-KV		33.8	34.0	
	COLOR		0.9	0.9	
	SPECIFIC GRAVITY		878	.889	
	VISUAL		Clear	Clear	
	POWER FACTOR		---	-	
	KARL FISCHER-MOISTURE PPM		10	25	
	PPM PCB		---	3	
	TEMPERATURE				
GAS ANALYSIS	HYDROGEN		---	ND	
	OXYGEN		38824	30478	
	NITROGEN		57051	38366	
	METHANE		---	ND	
	CARBON MONOXIDE		16	ND	
	CARBON DIOXIDE		664	889	
	ETHANE		---	ND	
	ETHYLENE		---	ND	
	ACETYLENE		---	ND	
	PROPANE		---	ND	
	COMBUSTIBLE GASES		16	0	
	TOTAL GAS CONTENT		98555	89731	
METAL ANALYSIS	ALUMINUM				
	IRON				
	ZINC				
	COPPER				
	LEAD				
	SILVER				
	TIN				

Gas & Metal concentrations are in PPM. (ND=None Detected)

OIL CONDITION THIS ANALYSIS: ACCEPTABLE _____ QUESTIONABLE _____ UNACCEPTABLE _____

COMMENTS/RECOMMENDATIONS: Oil quality OK. Maintain current sampling schedule.SAMPLED BY: C ARRINGTON DATE 10/18/95

DYNEX

DYNEX Industries Inc

INSULATING OIL TEST RESULTSCUSTOMER MENASHA CORPORATION JOB NUMBER Z-51363-28LOCATION OTSEGO, MI SUB./EQUIP. NAME Sub # 11 West Truck DumperMFG. Allis Chalmers LIQUID TYPE Mineral Oil LEAKING? NoS/N: 3648424 LIQUID GALLONS: 38 LIQUID LEVEL? GoodKVA: 100 PHASE: Single PAINT CONDITION? GoodPri V: 2400/4160 INDOOR: HAS SAMPLE VALVE? NoSec. V: 240/480 OUTDOOR: Yes OTHER?

		DATE	9/8/94	10/30/95	
		SAMPLE NUMBER	28	28	
QUALITY ANALYSIS	ACIDITY-MG-KOH/G		014	.025	
	INTERFACIAL TENSION-DYNE/CM		33.8	34.1	
	DIELECTRIC-KV		37.2	40.8	
	COLOR		.07	0.8	
	SPECIFIC GRAVITY		.880	.884	
	VISUAL		Clear	Clear	
	POWER FACTOR		----	-	
	KARL FISCHER-MOISTURE PPM		10	22	
	PPM PCB		----	< 2	
	TEMPERATURE				
GAS ANALYSIS	HYDROGEN		1	ND	
	OXYGEN		23294	27055	
	NITROGEN		61219	35839	
	METHANE		6	3	
	CARBON MONOXIDE		493	112	
	CARBON DIOXIDE		8518	6451	
	ETHANE		----	ND	
	ETHYLENE		29	29	
	ACETYLENE		----	ND	
	PROPANE		----	ND	
	COMBUSTIBLE GASES		529	143	
	TOTAL GAS CONTENT		93560	69287	
	ALUMINUM				
METAL ANALYSIS	IRON				
	ZINC				
	COPPER				
	LEAD				
	SILVER				
	TIN				

Gas & Metal concentrations are in PPM. (ND=None Detected)

OIL CONDITION THIS ANALYSIS: ACCEPTABLE X QUESTIONABLE UNACCEPTABLE COMMENTS/RECOMMENDATIONS: Oil quality OK. Maintain current sampling schedule.SAMPLED BY: C. ARRINGTON DATE 10/18/95

DYNEX

DYNEX Industries Inc

INSULATING OIL TEST RESULTSCUSTOMER MENASHA CORPORATION JOB NUMBER Z-51363-29LOCATION OTSEGO, MI SUB./EQUIP. NAME Sub # 11 West Truck DumperMFG Allis ChalmersLIQUID TYPE Mineral OilLEAKING? NoS/N: 3648427LIQUID GALLONS 36LIQUID LEVEL? GoodKVA 100PHASE SinglePAINT CONDITION? GoodPri V: 2400/4160INDOOR HAS SAMPLE VALVE? NoSec. V: 240/480OUTDOOR XOTHER?

	DATE	9/8/94	1030/95		
	SAMPLE NUMBER	29	29		
QUALITY ANALYSIS	ACIDITY-MG-KOH/G	018	.021		
	INTERFACIAL TENSION-DYNE/CM	35.9	34.4		
	DIELECTRIC-KV	40.2	39.0		
	COLOR	0.6	0.8		
	SPECIFIC GRAVITY	879	.882		
	VISUAL	Clear	Clear		
	POWER FACTOR	----	-		
	KARL FISCHER-MOISTURE PPM	5	12		
	PPM PCB	----	< 2		
	TEMPERATURE				
GAS ANALYSIS	HYDROGEN	----	ND		
	OXYGEN	23484	25050		
	NITROGEN	57359	37032		
	METHANE	5	3		
	CARBON MONOXIDE	441	150		
	CARBON DIOXIDE	5782	4554		
	ETHANE	----	ND		
	ETHYLENE	14	14		
	ACETYLENE	----	ND		
	PROPANE	----	ND		
	COMBUSTIBLE GASES	460	187		
	TOTAL GAS CONTENT	87065	88803		
	ALUMINUM				
METAL ANALYSIS	IRON				
	ZINC				
	COPPER				
	LEAD				
	SILVER				
	TIN				

Gas & Metal concentrations are in PPM. (ND=None Detected)

OIL CONDITION THIS ANALYSIS: ACCEPTABLE X QUESTIONABLE UNACCEPTABLE COMMENTS/RECOMMENDATIONS: Oil quality OK. Maintain current sampling schedule.SAMPLED BY: C. ARRINGTON DATE 10/18/95



DYNEX Industries Inc

INSULATING OIL TEST RESULTS

CUSTOMER MENASHA CORPORATION JOB NUMBER Z-51363-22LOCATION OTSEGO, MI SUB./EQUIP. NAME #17 TANK FURNACE

MFG. GENERAL ELECTRIC	LIQUID TYPE MINERAL OIL	LEAKING? NO
S/N. RGJ0404	LIQUID GALLONS 270	LIQUID LEVEL? OK
KVA. 730	PHASE. 3	PAINT CONDITION? OK
Pri. V. 2300	INDOOR. -	HAS SAMPLE VALVE? YES
Sec. V. 480	OUTDOOR. X	OTHER? -

	DATE	4/25/94	10/30/95		
	SAMPLE NUMBER	22	22		
QUALITY ANALYSIS	ACIDITY-MG-KOH/G	018	.021		
	INTERFACIAL TENSION-DYNE/CM	27.8	29.4		
	DIELECTRIC-KV	38.4	34.6		
	COLOR	8	1.2		
	SPECIFIC GRAVITY	872	.876		
	VISUAL	Clear	Clear		
	POWER FACTOR	-	-		
	KARL FISCHER-MOISTURE PPM	9	19		
	PPM PCB	-	< 2		
	TEMPERATURE	-	-		
GAS ANALYSIS	HYDROGEN	ND	ND		
	OXYGEN	29799	29372		
	NITROGEN	50227	35806		
	METHANE	9	12		
	CARBON MONOXIDE	137	126		
	CARBON DIOXIDE	6013	6645		
	ETHANE	5	9		
	ETHYLENE	40	75		
	ACETYLENE	ND	ND		
	PROPANE	ND	ND		
	COMBUSTIBLE GASES	191	225		
	TOTAL GAS CONTENT	86230	72048		
	ALUMINUM	-			
	IRON	-			
METAL ANALYSIS	ZINC	-			
	COPPER	-			
	LEAD	-			
	SILVER	-			
	TIN	-			

Gas & Metal concentrations are in PPM. (ND=None Detected)

OIL CONDITION THIS ANALYSIS: ACCEPTABLE X QUESTIONABLE _____ UNACCEPTABLE _____COMMENTS/RECOMMENDATIONS: Oil quality OK. Maintain current sampling scheduleSAMPLED BY: C. ARRINGTON DATE 10/18/95



DYNEX Industries, Inc

INSULATING OIL TEST RESULTS

CUSTOMER MENASHA CORPORATION JOB NUMBER Z-51363-24LOCATION OTSEGO, MI SUB./EQUIP. NAME Sub # 14 East Truck DumperMFG. Westinghouse LIQUID TYPE Mineral Oil LEAKING? NoS/N: 73AL890 LIQUID GALLONS LIQUID LEVEL? GoodKVA: 100 PHASE Single PAINT CONDITION? GoodPri. V. 2400/4160 INDOOR HAS SAMPLE VALVE? NoSec. V. 240/480 OUTDOOR OTHER?

	DATE	9/8/94	10/30/95		
	SAMPLE NUMBER	24	24		
QUALITY ANALYSIS	ACIDITY-MG-KOH/G	021	.021		
	INTERFACIAL TENSION-DYNE/CM	36.8	34.6		
	DIELECTRIC-KV	37.8	36.4		
	COLOR	0.6	0.8		
	SPECIFIC GRAVITY	882	.881		
	VISUAL	Clear	Clear		
	POWER FACTOR	----	-		
	KARL FISCHER-MOISTURE PPM	5	23		
	PPM PCB	----	< 2		
	TEMPERATURE				
GAS ANALYSIS	HYDROGEN	31	ND		
	OXYGEN	26819	23355		
	NITROGEN	77655	36702		
	METHANE	22	9		
	CARBON MONOXIDE	855	226		
	CARBON DIOXIDE	6043	3544		
	ETHANE	13	7		
	ETHYLENE	31	23		
	ACETYLENE	----	ND		
	PROPANE	----	ND		
	COMBUSTIBLE GASES	952	285		
	TOTAL GAS CONTENT	111469	63866		
METAL ANALYSIS	ALUMINUM				
	IRON				
	ZINC				
	COPPER				
	LEAD				
	SILVER				
	TIN				

Gas & Metal concentrations are in PPM. (ND=None Detected)

OIL CONDITION THIS ANALYSIS: ACCEPTABLE _____ QUESTIONABLE _____ UNACCEPTABLE _____

COMMENTS/RECOMMENDATIONS: Oil quality OK. Maintain current sampling schedule.



DYNEX Industries, Inc.

INSULATING OIL TEST RESULTS

CUSTOMER MENASHA CORPORATION JOB NUMBER Z-51363-25LOCATION OTSEGO, MI SUB./EQUIP. NAME Sub # 14 East Truck Dumper

MFG: <u>Westinghouse</u>	LIQUID TYPE: <u>Mineral Oil</u>	LEAKING? <u>No</u>
S/N: <u>74AA14542</u>	LIQUID GALLONS: _____	LIQUID LEVEL? <u>Good</u>
KVA: <u>100</u>	PHASE: <u>Single</u>	PAINT CONDITION? <u>Good</u>
Prt. V: <u>2400/4160</u>	INDOOR: _____	HAS SAMPLE VALVE? <u>No</u>
Sec. V: <u>240/480</u>	OUTDOOR: <u>X</u>	OTHER? _____

	DATE	9/8/94	10/30/95		
	SAMPLE NUMBER	25	25		
QUALITY ANALYSIS	ACIDITY-MG-KOH/G	.014	.014		
	INTERFACIAL TENSION-DYNE/CM	38.4	29.0		
	DIELECTRIC-KV	42	33.8		
	COLOR	1.0	1.0		
	SPECIFIC GRAVITY	.888	.891		
	VISUAL	Clear	Clear		
	POWER FACTOR	---	-		
	KARL FISCHER-MOISTURE PPM	3	17		
	PPM PCB	---	<2		
	TEMPERATURE				
GAS ANALYSIS	HYDROGEN	31	ND		
	OXYGEN	15814	21393		
	NITROGEN	77434	41858		
	METHANE	261	184		
	CARBON MONOXIDE	966	530		
	CARBON DIOXIDE	8187	5499		
	ETHANE	165	115		
	ETHYLENE	876	835		
	ACETYLENE	20	12		
	PROPANE	---	ND		
	COMBUSTIBLE GASES	2392	1656		
	TOTAL GAS CONTENT	101827	70406		
METAL ANALYSIS	ALUMINUM				
	IRON				
	ZINC				
	COPPER				
	LEAD				
	SILVER				
	TIN				

Gas & Metal concentrations are in PPM. (ND=None Detected)

OIL CONDITION THIS ANALYSIS: ACCEPTABLE X QUESTIONABLE _____ UNACCEPTABLE _____COMMENTS/RECOMMENDATIONS: Oil quality OK. DGA indicates high temperature arcing. Thermal decomposition of cellulose. Maintain current sampling schedule.SAMPLED BY: C ARRINGTON DATE 10/18/95

DYNEX

DYNEX Industries, Inc.

INSULATING OIL TEST RESULTSCUSTOMER MENASHA CORPORATION JOB NUMBER Z-51363-26LOCATION OTSEGO, MI SUB./EQUIP. NAME Sub # 14 East Truck Dumper

MFG: <u>Westinghouse</u>	LIQUID TYPE: <u>Mineral Oil</u>	LEAKING? <u>No</u>
S/N: <u>74AA14944</u>	LIQUID GALLONS: _____	LIQUID LEVEL? <u>Good</u>
KVA: <u>100</u>	PHASE: <u>Single</u>	PAINT CONDITION? <u>Good</u>
Prl. V: <u>2400/4160</u>	INDOOR: _____	HAS SAMPLE VALVE? <u>No</u>
Sec. V: <u>240/480</u>	OUTDOOR: <u>X</u>	OTHER? _____

	DATE	9/8/94	10/30/95		
	SAMPLE NUMBER	26	26		
QUALITY ANALYSIS	ACIDITY-MG-KOH/G	.014	.021		
	INTERFACIAL TENSION-DYNE/CM	34.5	34.4		
	DIELECTRIC-KV	22.8	23.4		
	COLOR	1.0	1.0		
	SPECIFIC GRAVITY	.887	.891		
	VISUAL	Clear	Clear		
	POWER FACTOR	---	-		
	KARL FISCHER-MOISTURE PPM	13	31		
	PPM PCB	---	<2		
	TEMPERATURE				
GAS ANALYSIS	HYDROGEN	5	55		
	OXYGEN	40105	23252		
	NITROGEN	57452	35719		
	METHANE	---	38		
	CARBON MONOXIDE	15	73		
	CARBON DIOXIDE	1291	4627		
	ETHANE	5	24		
	ETHYLENE	18	163		
	ACETYLENE	---	6		
	PROPANE	---	ND		
	COMBUSTIBLE GASES	43	363		
	TOTAL GAS CONTENT	98891	63957		
METAL ANALYSIS	ALUMINUM				
	IRON				
	ZINC				
	COPPER				
	LEAD				
	SILVER				
	TIN				

Gas & Metal concentrations are in PPM. (ND=None Detected)

OIL CONDITION THIS ANALYSIS: ACCEPTABLE X QUESTIONABLE _____ UNACCEPTABLE _____COMMENTS/RECOMMENDATIONS: Oil quality OK. DGA indicates high temperature arcing. Thermal decomposition of cellulose. Low Dielectric.SAMPLED BY: C. ARRINGTON DATE 10/18/95

Attachment #4

Transformer Serial #: H881099

Transformer Manufacturer: General Electric

PCB Concentration: < 2 ppm

Date Oil Sampled: October 18, 1995

Oil Sampled By: Dynex Industries, Inc.
23460 Industrial Park Drive
Farmington Hills, MI 48335
(810) 477-6066

Dynex Industries, Inc. Job #: Z-51363-5


Transformer Spill/Disposal: Contact Otsego Mill Environmental Supervisor

SAMPLE

equipment or other information to indicate the type of dielectric fluid, then the equipment must be assumed to be a PCB Transformer (500 ppm or greater). Transformers which are known to contain mineral oil dielectric fluid and whose PCB concentration is unknown, must be assumed to be PCB-Contaminated Electrical Equipment (50-499 ppm) and must be treated as such. However, if the PCB concentration has ever been known or if a person has reason to know the concentration equalled or exceeded 500 ppm PCBs, the transformer must be treated as a PCB Transformer. These "assumption rules" effectively apply to all regulatory requirements relating to the equipment including: use and servicing, leaks and spills, sale for reuse, storage for disposal, and disposal.

Q2: Can screening tests, such as Clor-n-Oil™, be used to determine the PCB concentration of a transformer? If so, can "Certified Non-PCB" labels be used to classify transformers based upon a screen test?

A2: Currently, the regulations do not require that any particular testing method be utilized when determining the PCB concentration in transformers. However, because EPA does not recognize the results of such field concentration screening tests for purposes of classifying transformers, transformer owners should prudently scrutinize PCB testing options, as there are significant differences in the integrity and accuracy of various testing methods. It should be noted that, in most situations, EPA will utilize laboratory gas-chromatography (GC) testing to determine PCB concentrations during facility inspections. EPA recommends that owners of electrical equipment choose testing methods, and practice sampling procedures, which are analytically accurate, reproducible, assure quality control, and are certifiable.



The use of non-PCB labels is unregulated by EPA. That is to say, there are no prohibitions or requirements to place non-PCB labels on transformers. However, if non-PCB labels are used to indicate the classification of equipment, then owners should be able to provide documentation such as test results or manufacturer's letters along with historic service records which will substantiate the non-PCB classification. A criminal action could be pursued for someone intentionally using non-PCB labels on known or assumed PCB Items.

Q3: Can I batch test oil samples from several transformers and classify each unit based upon one test result?

A3: The only place in the regulations where "batch testing" is allowed is under testing procedures for disposal of PCBs [761.60(g)]. It is only owners or users of mineral oil

Attachment #5



DYNEX Industries, Inc

23460 Industrial Park Drive • Farmington Hills, MI 48335 • (810) 477-6066
FAX (810) 477-6069

November 28, 1995

Mr. Keith Kling
Menasha Corporation
P.O. Box 155
Otsego, MI 49018

Dear Mr. Kling:

In an effort to prevent cross contamination of transformers, DYNEX performs the following in-house and on the job procedures:

1. All pumps are self contained and utilize the following color code:
Yellow - Transformer fluids over 500 PPM
Red - Transformer fluids between 50 and 500 PPM
Blue - Transformer fluids 49 PPM and below
2. Each pump uses fittings unique to its color code. This prevents hoses, stand pipes and filters from being interchanged.
3. Its a policy of DYNEX to require up-to-date test results indicating the fluid type and PPM level prior to on-site work. This allows us to provide the proper equipment.
4. Prior to and after each job all tools, pumps and fittings are decontaminated (refer to enclosed procedures).
5. In addition to the decontamination procedure, random wipe and fluid samples are analyzed for PCB.
6. All DYNEX employees are trained in the proper handling of transformer fluids and are extremely aware of problems associated with cross contamination.

We feel the procedures described above and enclosed will assure that your transformers remain non PCB. As an additional assurance, DYNEX will remove a sample and test for PCB, when servicing of your transformers requires removal and/or replacement of the fluid. This will be performed at no additional cost to you.

I hope the above information proves useful in the evaluation of DYNEX as your Transformer Service Company.

We look forward to being of service to you in the near future. If you have any questions, please do not hesitate to contact me at the above number.

Sincerely,
DYNEX Industries, Inc.

A handwritten signature in black ink, appearing to read "Ron Cuthbert".

Ron Cuthbert
Project Manager

RC/pm

enclosure

Introduction

Any piece of equipment which is taken out of the van and used can become contaminated with PCB or TF-1. Before reloading these tools, etc., decontamination with a suitable solvent is required. Isopropal alcohol or kerosene will be used for this purpose and will arrive at the site with the supply truck and van. Also, electro clean solvent will be utilized as a cleaner for the rinse/fill adaptor.

What to Decontaminate

- o All hand tools including wrenches, screwdrivers, drum bung-wrenches, etc.
- o Any recyclable items which have been used for spill containment.
- o The tops of the pump module, the pump drip pan, and drums which may have contaminated items laid upon them.
- o Rinse/fill adaptor and residual liquid dip tube.
- o Hoses (hose connections) Outside only.
- o Dielectric tester bath
- o California nozzle and pump prefilter.

How to Decontaminate

The technician decontaminating should be wearing goggles, respirator, protective suit and gloves to eliminate exposure to kerosene, alcohol, electro clean, PCB's or TF-1.

A. Hand Tools, Residual Liquid Driptube

- 1) Place all potentially contaminated tools in a drip pan.
- 2) Pour a small amount of solvent onto a rag(s) over the pan.
- 3) Thoroughly wipe all external surfaces with the wetted rag.
- 4) Repeat the process for a double rinse.
- 5) Place tools on dry rags, wipe dry and reload.

B. Rinse/Fill Adaptor

- 1) Have wetted rag ready when adaptor is pulled off transformer.
- 2) Wipe all external surfaces. Make an effort to clean annular space around nozzle and pipe. Use Electro clean solvent.
- 3) Wipe dry and immediately place in large plastic bag. Sharp surfaces should be protected from piercing the bag.

C. Pump Module, Drum Tops, etc.

- 1) Wet rags (by dipping in drip/catch pan containing solvent)
- 2) Wipe external surfaces concentrating on any oily-looking areas.
- 3) Wipe dry and reload equipment.
- 4) Store filter, dip tube, etc. in disposable plastic bags. Change bags frequently.

D. Hoses

- 1) Any hose used for draining or rinsing (hence contaminated fluid) must have had a minimum of 1/2 drum of uncontaminated dielectric fluid pumped thru it before returning it to the van.

Clean-up

- o Throw all rags used into the solid waste drum.
- o Pour absorbent/used rags into the solvent drip/catch pan to soak up residual liquid. Place drip pan and contents into the solid waste drum.

Solvent Handling - Safety

- o No smoking
- o Limit exposure to vapors and avoid contact with skin
- o Wash off of skin immediately with soap and warm water
- o Keep containers of solvent closed

DYNEX

DYNEX Industries, Inc.

**DYNEX'S
CREDENTIALS**



TRANSFORMER SERVICE OVERVIEW

DYNEX has been involved with PCB disposal for many years. We have transported millions of pounds of PCBs and have removed and replaced thousands of PCB transformers.

Our PCB "turnkey" changeout service is unique, as we use only our own skilled technicians in the handling and transporting of PCB liquids, solids and equipment.

PCB Services

Much emphasis has been placed on PCB services. Our company feels a total "turnkey" service can best serve the complete needs of customers. Included in this service are:

- Engineering services and evaluations
- Recommendation of replacement transformers and capacitors regardless of type or brand manufacturer
- Sale of new equipment as specified by customers
- Physical removal of existing equipment
- Installation of new equipment
- Transportation of PCB liquids and solids to disposal sites
- Disposal of PCB equipment, liquids and solids.

In addition to the "turnkey" service, our company offers:

- Oil testing
- Retrofilling of PCB contaminated oil transformers
- Clean up of PCB spills
- Repair of PCB leaks
- Clean up of PCB contaminated hydraulic machines
- Clean up of PCB contaminated elevator systems
- Disposal of PCB ballasts
- Repair of transformers, i.e. bushing leak repair, oil filtering, tap changer repair, etc.

Areas Served

Geographically we provide nationwide service for our customers. This is accomplished by our fully staffed service and marketing centers in St. Paul, Minnesota; Detroit, Michigan; and Chicago, IL.

Customers Served

We serve a wide variety of customers from governmental installations to commercial facilities to industrial plants. These have included armed force bases, colleges, universities, hospitals, mining companies, paper mills, foundries, airports and more. Please see the enclosed reference list for specific locations and project scopes.

New Replacement Equipment

We have changed out thousands of transformers and capacitors, gaining a considerable amount of experience concerning equipment. As an independent company, we offer objective recommendations of equipment for customers regardless of brand name.

Employees

DYNEX believes that the work related to PCB handling is most important. All technical personnel have proper certification/education and "hands on" working experience with electrical apparatus, transformers and the handling of PCB materials. In addition, our company stresses safety through carefully planned procedures.

Our technicians are also trained in rigging of equipment and PCB spill clean up. The philosophy of our company is to only use trained personnel in the handling of PCB materials and equipment.

In addition, our employees are trained and experienced to perform routine electrical work. This allows our company to provide a true turnkey service by using our own employees and equipment for rigging, electrical work, handling and transportation of PCBs.

Work Equipment

Our company buys or makes the equipment necessary to perform work in a safe and efficient manner. A number of special cranes and rigging devices are designed for unique removal situations.

In addition, our company owns all its trucks and related vehicles.

Procedures

One of the reasons for the success of our company is dedication to safety and training. Our company strives to keep all personnel informed of new regulations and techniques.

Some of the procedures established and employed are:

- Emergency spill plan
- Safety procedures in handling, loading and transporting PCBs
- Safety and first aid plans
- Accident reporting plan
- Safety meeting plans and procedures
- Disposal site plan
- Work procedures - general - for overview of work duties
- Work procedures - specific - developed for each job

Types of Jobs

Experience has involved the physical removal of transformers and capacitors of various sizes, shapes and styles. These have been located in underground vaults, electrical vaults, basements, rooftops, mezzanines and more.

Thus far, our company has removed and replaced thousands of transformers and capacitors. Sizes of the transformers have been from 5 KVA to 10,000 KVA. Millions of pounds of PCBs have been handled with no citations or reprimands by the EPA.

DYNEX - the professional alternative for PCB services.



CUSTOMER POLLUTION LIABILITY ASSURANCE

In this age of environmental pollution concerns, it is important to make the right choices in determining who will be handling your PCB hazardous waste. DYNEX has properly disposed of millions of capacitors, millions of gallons of PCB liquid, and thousands of transformer carcasses since PCB's were regulated by the EPA in 1978, all without citation, violation, or fines from the EPA. Few, if any, companies can make such a claim.

Our policy is to use no subcontractors in handling PCB materials. There are no second or third parties involved to confuse responsibility or liability. In the event an environmental incident should occur, our crews are fully trained and capable of responding to any situation.

DYNEX carries contractors pollution legal liability insurance to complete the umbrella of protection for our customers. We do not rely on another party's insurance for liability protection when we're handling PCB materials.

As you can see, our full service approach in the handling of PCB hazardous waste makes DYNEX the right choice for your removal and disposal needs.

**General Operating and Safety Procedures
for Handling, Loading, Securing and Transporting**

A. Before Leaving Plant Site For Pick Up Of Material:

1. Be sure that a complete safety check is made of equipment.
 - a. Tires
 - b. Safety Equipment
 - c. Locks
 - d. Chains & Binders
2. Be sure to check paperwork
 - a. Manifest
 - b. Trip mileage and fuel log sheet
 - c. Vehicle condition reports
 - d. Advance monies if needed
3. Call in Periods
 - a. Upon completion of job, before leaving customers facility.
 - b. Emergency
 - c. In the event of downtime
 - d. Monday morning to give time for previous week, report to job controller.

The reason for calling is very simple, DYNEX needs to know of your progress or lack of, so that scheduling can be maintained with a minimum of lost time.

B. Arrival At Customer Facility

1. Follow DYNEX procedures
 - a. Report to customer contact
 - b. Be courteous
 - c. Scope out job site
 - d. Proceed as required to loading/unloading area
 - e. Prepare unit for loading/unloading. Make sure you lay poly around work area before equipment is brought in.
2. Observe loading (Van)
 - a. Spot check 3-5 drums during loading procedure - DO NOT LOAD ANY DRUM THAT IS LEAKING.
 - b. Insure all required labeling is attached

C. During Highway Travel

1. Make periodic stops
 - a. Inspect complete vehicle physically
 1. Tires
 2. Check for leaks
 3. Note any deficiencies and have them repaired as is practical
2. During stops
 - a. Hazardous Material placarded vehicles must be attended by one of the drivers
 - b. Vehicle must be away from other vehicles and buildings. Also vehicle must be in sight of attendant driver.
 - c. If during stop you note overheated tire, you must determine cause - have tire removed and placed a safe distance from placarded vehicle (deterrent to fire hazards).

D. Trip Progress Reports - Driver Logs

1. Trip mileage - Fuel report
 - a. You need to record mileage within each state
 - b. Maintain your drivers log, upon request for inspection by authorized personnel you must produce same.
 - c. Be sure all papers carried are in order for inspection, if request is made.

E. Accidents

1. In the case of an accident
 - a. Stop immediately.
 - b. If a spill is involved make sure you get traffic stopped.
 - c. Take all necessary precautions to prevent further accidents at the scene.
 - d. Set out warning devices.
 - e. Use your CB radio or a telephone to notify authorities.
 - f. Call DYNEX office as soon as practical.
 - g. Render all possible assistance.
 - h. Check trailer to be sure there is no leakage
 - i. Gather all practical information possible (witnesses, names, addresses, phone numbers). Assess, as best you can, damages to all vehicles.
 - j. Sketch, as well as possible, accident scene, direction of vehicles, intersection, etc.
 - k. Try to keep people who are not authorized from congregating at scene.
 - l. Make sure fire hazards are at a minimal (no cigars, cigarettes, or flame).
 - m. No flame type warning devices are to be allowed on Hazardous Material accident scenes.

F. Incidents - (Spills-Leakage)

1. If a leak is noticed:
 - a. Progress only far enough to stop safely, examine leakage, determine needed area for containment.
 - b. If it is a small leak and repairable, do so. If it is a larger leak and along divided highway, attempt to move vehicle adjacent to median. Usually medians run for considerable distance without drain-off. If along regular two lane highway, attempt to avoid culvert drainage area.

F. Incidents - (Spills-Leakage) cont'd

- c. Start to contain spill, dam up area as best you can.
- d. As soon as possible, advise DYNEX.
- e. Let DYNEX know if it is a leak or spill. Let them know what kind of equipment is needed (vacuum truck, another truck with trailer, skimmer equipment, etc.).
- f. Set out necessary traffic warning signals.
- g. Notify authorities - CB radio or telephone.
- h. Remove emergency gear - boots and other needed protective gear.
- i. Emergency transfer of material from one truck to another is permitted if hazardous material.
- j. As soon as DYNEX personnel arrive, set up a command post.
- k. Be sure all papers are available to authorities, so that proper methods of handling the material can be recognized.
- l. Make necessary notes, regarding cause, type of material, what precautions were taken. All information is needed by DYNEX to file incident report.

2. DYNEX - Material Handling

- a. Be sure all information received initially, is thoroughly understood so that all needed equipment and manpower is dispatched effectively.
- b. DYNEX will see to it that needed vehicles are made available and dispatched.
- c. No information regarding material is to be given out except to proper authorities. DYNEX Representative at scene will handle questions.
- d. Make sure only necessary vehicles and personnel are allowed at the scene.
- e. After spill clean up is finished, an incident report must be filed. DYNEX will see that this report is filed with information available.

G. Weather**1. Winter - Summer**

- a. Keep abreast of weather conditions via CB radio, use radio broadcasts. Base locality will call for weather and road conditions.
- b. Under no conditions is Hazardous Material to be transported on the highway system when travel advisories are being broadcasted.
- c. If it is necessary to stop because of inclement weather conditions, inform DYNEX. Inform them of conditions, keeping in touch at various intervals of time so that DYNEX and yourself has an opportunity to properly evaluate and make all necessary changes in scheduling.
- d. Scheduling of pick up and deliveries during severe weather conditions is the responsibility of Transportation Manager. Drivers will report conditions that they are encountering and decisions arrived at from conversation between driver and Transportation Manager as to any further movement will be discussed. Judgement of the driver facing hazardous driving conditions needs to be reconciled.

H. Equipment and Drivers

- 1. The Transportation Manager will make sure that all vehicles being used to transport Hazardous Materials are in a safe condition prior to dispatch. By simple communications with dispatchers and maintenance people this can be ascertained.

H. Equipment and Drivers cont'd

- a. Transportation department personnel will make sure all vehicle condition reports are finalized as to needed repair per each driver request. Condition report will then be signed and filed in proper equipment numbered file.
- b. If for any reason equipment is not repaired, Transportation Manager must be informed - only he can make decision to use, or to side line equipment out of service.
- c. Equipment shall be kept clean. This is both good for driver moral and company image.
- d. Transportation Department personnel will make sure permits, decals relating to permits, numbers relating to fuel permits, cab cards are either in each vehicle or available to the driver. Information regarding special permit pick up also needs to be transmitted to drivers.
- e. All possible attempts should be made by Transportation Department to enlighten each driver as far in advance of next dispatch as possible. Driver, when off duty at terminal site, needs to report if he is away from home and where he may be reached. Communications must be constant so that scheduling levels can be maintained.
- f. Drivers are to turn in completed log sheets to the Transportation Manager at completion of each trip. Drivers as well as Transportation Manager must ascertain prior to dispatch that enough driver time exist, so that trip can be made without any legal technicality. Under no circumstance will DYNEX participate in allowing any of its drivers to be operating vehicles in violation of driving time status that can be cause for fines, both do driver and company.
- g. Driver must remember to call in daily, (between the hours of 9:00 a.m. and 12:00 noon). This is done so that Transportation Department can adjust scheduling, also there may be vital information that needs to be relayed. It is essential that this type of communication take place.

I. Shipping Papers - Trip Cost Related Papers

1. Drivers will see to it that at the end of each trip, all pertinent papers are delivered to Transportation Manager.
 - a. In the case of shipping documents, signatures, weights and other essential information has been affixed.
 - b. Traffic department will generate all paper for trips as they are assigned.
 1. Trip cost sheet, delivery tickets, trip mileage and fuel analysis, product information, Hazardous Bill of Lading.
 - c. All drivers are required to have valid, operators license. Must be able to pass Drivers test. Must pass physical examination.
 - d. Drivers must take care of renewals of any license.



DYNEX Industries, Inc.

23460 Industrial Park Drive • Farmington Hills, MI 48335 • (810) 477-6066
FAX (810) 477-6069

IF A SPILL SHOULD OCCUR:

1. The truck driver notifies DYNEX Emergency Coordinators at the following numbers:

Bruce Robinson
810-477-6066
313-283-5683

Dave Laura
810-477-6066
313-379-4814
810-604-1353 Beeper

Andy Efird
810-477-6066
810-960-7747
313-940-4312 Beeper

Roger Ranzau
612-784-4040
612-432-0152

Gene Philipp
612-784-4040
612-786-0202

Brian Sjoberg
612-784-4040
612-483-0206

2. The DYNEX Emergency Coordinator will:
 - a. Decide if the spill response brigade with associated spill containment equipment can respond to the site in a reasonable time. (if possible, the spill response brigade and equipment will be sent to the site).
 - b. Decide, and if necessary, send spill clean-up supervision to the site by the fastest method, including private chartered aircraft.
3. The truck driver will instruct local fire, police and regulatory personnel to help in containment of the spill. The truck driver will instruct the local fire response groups to not flush the spilled PCBs from the spill site.
4. The truck driver will use his containment equipment to construct a temporary containment system for the spilled liquid.
5. DYNEX spill clean-up supervision will determine whether vacuum trucks will be used, or if other EPA approved methods will be employed.
6. Spill containment and collection equipment for contaminated solids will be transported to the site.
7. Containment dirt will be collected in DOT 17H metal drums by the spill response team.
8. The PCB liquid will be sent to an EPA approved disposal facility for incineration or detoxification. The PCB contaminated solids will be sent to an EPA approved incinerator or landfill site permitted to handle the material.
9. DYNEX has access to a private aircraft which can respond within an hour.
10. Upon completion of the spill clean-up, all contaminated equipment, materials, etc. will be decontaminated according to Annex IV, 40 CFR 761.43.
11. At all times, compliance with 40 CFR 761 will be maintained.

All shipping papers, marking labels and manifests (unless state regulations require generator or receiver of hazardous waste to furnish manifests) will be supplied and prepared by DYNEX.

DYNEX

DYNEX Industries, Inc.

UPDATE**DYNEX****OVER THE ROAD PCB SPILL RESPONSE PROCEDURES,
PERSONNEL SAFETY AND CONDUCT RULES AND
GENERAL GUIDELINES CONCERNING PCBs**

All truck drivers will maintain at all times the following emergency equipment on their vehicles:

Fire extinguisher
Emergency spill kit
Health certificate

Log
Truck Labels
Cab File

ALL PERSONNEL both those of the generator and DYNEX will strictly adhere to the following safety rules while in direct contact with PCB contaminated materials.

1. All personnel will wear protective clothing; disposable coveralls, gloves and boots.
2. Upon completion of any PCB related work all personal protective equipment will be placed in DOT 17H drums and disposed of in accordance with 40 CFR 761.
3. Care must be taken to prevent tools, machinery, vehicles, personal property and clothing from becoming contaminated. Personal hygiene must be stressed; i.e., washing hands and face before eating or drinking, as well as removal and disposal of protective clothing.
4. All personnel will report IMMEDIATELY to emergency coordinator at DYNEX, in the event of any spill or questionable circumstances in the field.

ALL PERSONNEL, both those of the generator and DYNEX shall adhere to the following:

1. Any surfaces that may encounter any exposure to PCBs will be covered with a protective layer of disposable poly.

Upon completion of the work the poly will be placed on DOT 17H drums and disposed of in accordance with 40 CFR 761.

2. Where drums are to be utilized for disposal of PCBs, only approved DOT 17E drums will be used for liquids and DOT 17H drums used for solids.

Attachment #6

WESTERN MICHIGAN ENVIRONMENTAL SERVICES, INC.

3352 128th Avenue, Holland, Michigan 49424-9263
Phone: 616-399-6070 FAX: 616-399-6185

MEN03125

SENT TO: Menasha Corporation
320 North Farmer
Otsego, Michigan 49078

Attn: Gary Roys

DATE: September 22, 1993

ANALYSIS OF: Oil Samples

REPORTED BY: Robert K. Zahray
Robert K. Zahray, Laboratory Manager

DATE RECEIVED: Received from client on August 25, 1993.

Sample ID: GE 8685583

Lab ID: 9308175-01

Collected: 08/24/93

TEST	RESULT	UNITS	ANALYZED	BY	METHOD	MDL
Polychlorinated Biphenyls					EPA 8080	
PCB-1016	BDL	mg/kg	09/03/93	DGK		0.5
PCB-1221	BDL	mg/kg	09/03/93	DGK		2.6
PCB-1232	BDL	mg/kg	09/03/93	DGK		0.5
PCB-1242	BDL	mg/kg	09/03/93	DGK		30
PCB-1248	BDL	mg/kg	09/03/93	DGK		30
PCB-1254	BDL	mg/kg	09/03/93	DGK		5
PCB-1260	BDL	mg/kg	09/03/93	DGK		10
Total PCB's	BDL	mg/kg	09/03/93	DGK		50
Waste Dilution	09/03/93	prep. date		LD	EPA 3580	

Sample ID: GE 8685575

Lab ID: 9308175-02

Collected: 08/24/93

TEST	RESULT	UNITS	ANALYZED	BY	METHOD	MDL
Polychlorinated Biphenyls					EPA 8080	
PCB-1016	BDL	mg/kg	09/03/93	DGK		0.5
PCB-1221	BDL	mg/kg	09/03/93	DGK		1
PCB-1232	BDL	mg/kg	09/03/93	DGK		0.5
PCB-1242	14	mg/kg	09/03/93	DGK		0.5
PCB-1248	BDL	mg/kg	09/03/93	DGK		0.5
PCB-1254	BDL	mg/kg	09/03/93	DGK		20
PCB-1260	BDL	mg/kg	09/03/93	DGK		6
Total PCB's	14	mg/kg	09/03/93	DGK		28
Waste Dilution	09/03/93	prep. date		LD	EPA 3580	

*sent to
APTUS
for
Disposal*

Sample ID: GE 8685374

Lab ID: 9308175-03

Collected: 08/24/93

TEST	RESULT	UNITS	ANALYZED	BY	METHOD	MDL
Polychlorinated Biphenyls					EPA 8080	
PCB-1016	BDL	mg/kg	09/14/93	DGK		3.7
PCB-1221	BDL	mg/kg	09/14/93	DGK		1.1
PCB-1232	BDL	mg/kg	09/14/93	DGK		3.7
PCB-1242	BDL	mg/kg	09/14/93	DGK		3.7
PCB-1248	BDL	mg/kg	09/14/93	DGK		3.7
PCB-1254	BDL	mg/kg	09/14/93	DGK		9.1
PCB-1260	BDL	mg/kg	09/14/93	DGK		3.7
Total PCB's	BDL	mg/kg	09/14/93	DGK		18
Waste Dilution	09/03/93	prep. date		LD	EPA 3580	

BDL = Below Detection Limit
MDL = Method Detection Limit

Sample ID: Westinghouse 4395268

Lab ID: 9308175-04

Collected: 08/24/9

TEST	RESULT	UNITS	ANALYZED	BY	METHOD	MDL
Polychlorinated Biphenyls					EPA 8080	
PCB-1016	BDL	mg/kg	09/14/93	DGK		1.2
PCB-1221	BDL	mg/kg	09/14/93	DGK		0.8
PCB-1232	BDL	mg/kg	09/14/93	DGK		1.2
PCB-1242	BDL	mg/kg	09/14/93	DGK		1.2
PCB-1248	BDL	mg/kg	09/14/93	DGK		1.2
PCB-1254	BDL	mg/kg	09/14/93	DGK		3.7
PCB-1260	BDL	mg/kg	09/14/93	DGK		1
Total PCB's	BDL	mg/kg	09/14/93	DGK		6.7
Waste Dilution	09/03/93	prep. date		LD	EPA 3580	

Sample ID: Westinghouse 4395273

Lab ID: 9308175-05

Collected: 08/24/9

TEST	RESULT	UNITS	ANALYZED	BY	METHOD	MDL
Polychlorinated Biphenyls					EPA 8080	
PCB-1016	BDL	mg/kg	09/14/93	DGK		2.4
PCB-1221	BDL	mg/kg	09/14/93	DGK		7
PCB-1232	BDL	mg/kg	09/14/93	DGK		2.4
PCB-1242	BDL	mg/kg	09/14/93	DGK		2.4
PCB-1248	BDL	mg/kg	09/14/93	DGK		2.4
PCB-1254	BDL	mg/kg	09/14/93	DGK		0.8
PCB-1260	BDL	mg/kg	09/14/93	DGK		1.3
Total PCB's	BDL	mg/kg	09/14/93	DGK		12
Waste Dilution	09/03/93	prep. date		LD	EPA 3580	

Sample ID: Westing.L252G56AA1 69F6683

Lab ID: 9308175-06

Collected: 08/24/9

TEST	RESULT	UNITS	ANALYZED	BY	METHOD	MDL
Polychlorinated Biphenyls					EPA 8080	
PCB-1016	BDL	mg/kg	09/14/93	DGK		0.5
PCB-1221	BDL	mg/kg	09/14/93	DGK		0.6
PCB-1232	BDL	mg/kg	09/14/93	DGK		0.5
PCB-1242	BDL	mg/kg	09/14/93	DGK		32
PCB-1248	BDL	mg/kg	09/14/93	DGK		32
PCB-1254	BDL	mg/kg	09/14/93	DGK		6
PCB-1260	BDL	mg/kg	09/14/93	DGK		3.3
Total PCB's	BDL	mg/kg	09/14/93	DGK		42
Waste Dilution	09/03/93	prep. date		LD	EPA 3580	

DNR
MICHIGAN DEPARTMENT
OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Act 64 PA
1979
1969

Failure
Section
Act 136
MEN03127

Form Approved OMB No 2050-0039 Expires 9-30-94

Please print or type

UNIFORM HAZARDOUS WASTE MANIFEST		Generator's US EPA ID No MI D 0 0 6 0 1 2 4 0 5		Manifest Document No MF 7 4		2 Page 1 of 2		Information in the shaded areas is not required by Federal law					
3 Generator's Name and Mailing Address Kenasha Corporation 320 North Farmer Street/P.O. Box Otsago, MI 49078-0155						A. State Manifest Document Number 15MI 3624147							
4 Generator's Phone (616) 692-6141						B. State Generator's ID							
5 Transporter 1 Company Name Tri-State Motor Transit CO.						C. State Transporter's ID							
6 US EPA ID Number MI 0 0 6 0 9 5 0 3 8 9 9 8						D. Transporter's Phone 417-624-3131							
7 Transporter 2 Company Name						E. State Transporter's ID							
8 US EPA ID Number						F. Transporter's Phone							
9 Designated Facility Name and Site Address Aptus, Inc. P.O. Box 1328/Hwy. 169 North Coffeyville, MI 67337						G. State Facility's ID							
10 US EPA ID Number MI 8 0 9 8 1 5 0 6 0 2 5						H. Facility's Phone 313-251-6180							
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER)						12 Containers		13 Total Quantity		14 Waste Unit			
						No Type		Quantity		No.			
a. RQ POLYCHLORINATED BIPHENYLS, 9, UN2315, PGIII						1		442		1			
b. RQ POLYCHLORINATED BIPHENYLS, 9, UN2315, PGIII						1		286		1			
c. NON HAZARDOUS, NON REGULATED, SPECIAL WASTE						1		1539		1			
d.													
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above							
a. drum of ballasts Storage Date SEE ATTACHMENT						a/ H							
b. drum of capacitors Storage Date SEE ATTACHMENT						b/ I							
c. transformer filled with 14 ppm PCB oil Storage Date/A						c/ I							
						d/ I							
15 Special Handling Instructions and Additional Information Work Order #106267 EMERGENCY NUMBER													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations													
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford													
Printed/Typed Name						Signature						Date	
17 Transporter 1 Acknowledgement of Receipt of Materials						Signature						Date	
Printed/Typed Name						Signature						Date	
18 Transporter 2 Acknowledgement or Receipt of Materials						Signature						Date	
Printed/Typed Name						Signature						Date	
19. Discrepancy Indication Space													
20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19													
Printed/Typed Name						Signature						Date	

ALL INFORMATION REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN A

ST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN A

ST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN A

DNR

MICHIGAN DEPARTMENT
OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE

ATT ☐ DIS. ☐ REJ. ☐ PR. ☐Required under authority of Act 64 PA
1979 as amended and Act 136 PA
1989Failure to
Section 2
Act 136

MEN03128

Form Approved OMB No 2050-0039 Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST		Generator's US EPA ID No MI 0006012405 MF 74 M		Manifest Document No MI 0006012405 MF 74 M		2 Page 1 of 2		Information in the shaded areas is not required by Federal law	
3 Generator's Name and Mailing Address Manasha Corporation 320 North Farmer Street/P.O. Box Otsago, MI 49078-0155				A. State Manifest Document Number MI 3624147					
4 Generator's Phone (616) 692-6141				B. State Generator's ID					
5 Transporter 1 Company Name Tri-State Motor Transit Co.				6 US EPA ID Number MI 0009503899 B		C. State Transporter's ID			
7 Transporter 2 Company Name				8 US EPA ID Number		D. Transporter's Phone MI 7-624-3131			
9 Designated Facility Name and Site Address Aptus, Inc. P.O. Box 1328/Wy. 169 North Coffeyville, KS 67337				10 US EPA ID Number KS 0981506025		E. State Transporter's ID			
						F. Transporter's Phone			
11 US DOT Description (including Proper Shipping Name, Hazard Class, and HM ID NUMBER)				12 Containers		13 Total Quantity		14 Waste	
a. RQ POLYCHLORINATED BIPHENYLS, 9, UN2315, PGIII				1 No. Type		13.75		14.1	
b. RQ POLYCHLORINATED BIPHENYLS, 9, UN2315, PGIII				1 No. Type		13.75		14.1	
c. NON HAZARDOUS, NON REGULATED, SPECIAL WASTE				1 No. Type		13.75		14.1	
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above		a/ 1		b/ 1	
a. drum of ballasts Storage Date SEE ATTACHMENT						c/ 1		d/ 1	
b. drum of capacitors Storage Date SEE ATTACHMENT									
c. transformer filled with 14 ppm PCB oil Storage Date N/A									
15 Special Handling Instructions and Additional Information Work Order #106267									
16. GENERATOR'S CERTIFICATION. I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations									
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment, OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford									
Printed/Typed Name				Signature		Date		Month Day Year	
12 Transporter 1 Acknowledgement of Receipt of Materials				Signature		Date		Month Day Year	
Printed/Typed Name				Signature		Date		Month Day Year	
18 Transporter 2 Acknowledgement of Receipt of Materials				Signature		Date		Month Day Year	
Printed/Typed Name				Signature		Date		Month Day Year	
19 Discrepancy Indication Space				Discrepancies reported to Keith Kling 11/6/95					
11a) 1 dm = 442 k. 11b) 1 dm = 266k									
20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19				Signature		Date		Month Day Year	
Printed/Typed Name				Signature		Date		Month Day Year	
Beverly Brown									

ALL SHILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MILWAUKEE AT 1-800-424-6802 24 HOURS PER DAY.

MEN03129

Aptus, Inc.
a subsidiary of Rollins
Environmental Services, Inc.

P O Box 1328
Coffeyville KS 67337
(316) 251-6380

APTUS

February 20, 1996

To: KEITH KLING
MENASHA CORPORATION
320 NORTH FARMER STREET
P O BOX 155
OTSEGO, MI 49078-0155

From: Environmental Affairs

RE: Aptus Document No. NF74M

Enclosed is your Certificate of Disposal from Aptus, which certifies that the waste material received on the referenced manifest has been properly disposed. Also enclosed is a detail summary of the movement of your material.

We appreciate your business and we look forward to assisting you with your waste management needs in the future.

Should you have any questions regarding your Certificate of Disposal, please contact Sheri Sanders at 1-316-252-1250.

Enclosures

APTUS

MEN03130

Aptus, Inc.
a subsidiary of Rollins
Environmental Services, Inc.

February 20, 1996

P.O. Box 1328
Coffeyville, KS 67337
(316) 251-6380

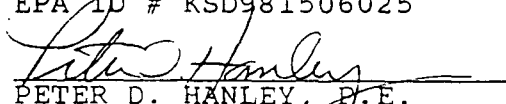
C E R T I F I C A T E O F D I S P O S A L

NO. 32366

MENASHA CORPORATION
320 NORTH FARMER STREET
P O BOX 155
OTSEGO, MI 49078-0155

- A. THIS IS TO CERTIFY THAT THE HAZARDOUS SUBSTANCE MANIFESTED TO APTUS ON APTUS DOCUMENT #NF74M WAS DISPOSED OF IN ACCORDANCE WITH 40 CFR 761 (AND 40 CFR 264 IF APPLICABLE) AS OF 02/10/96. ATTACHED, IS A DETAIL REPORT WHICH IDENTIFIES THE DATE(S) OF DISPOSAL AND THE PROCESS UTILIZED FOR EACH WASTE LISTED.
- B. UNDER CIVIL AND CRIMINAL PENALTIES OF LAW FOR THE MAKING OR SUBMISSION OF FALSE OR FRAUDULENT STATEMENTS OR REPRESENTATIONS (18 U.S. C. 1001 AND 15 U.S. C. 2615), I CERTIFY THAT THE INFORMATION CONTAINED IN OR ACCOMPANYING THIS DOCUMENT IS TRUE, ACCURATE AND COMPLETE. AS TO THE IDENTIFIED SECTIONS(S)(A.) OF THIS DOCUMENT FOR WHICH I CANNOT PERSONALLY VERIFY TRUTH AND ACCURACY, I CERTIFY AS THE COMPANY OFFICIAL HAVING SUPERVISORY RESPONSIBILITY FOR THE PERSONS WHO, ACTING UNDER MY DIRECT INSTRUCTIONS, MADE THE VERIFICATION THAT THIS INFORMATION IS TRUE, ACCURATE, AND COMPLETE.

APTUS
EPA ID # KSD981506025


PETER D. HANLEY, P.E.
MANAGER, ENVIRONMENTAL AFFAIRS

MEN03131

APTUS

DETAIL REPORT

PAGE NO. 1

GEL

MENASHA CORPORATION

320 NORTH FARMER STREET

P O BOX 155

OTSEGO

MI 49078-0155

EPA # MID006012405

PHONE: 6166926141

KEITH KLING

GCODE: 25204

CORRESPONDENT

MENASHA CORPORATION

320 NORTH FARMER STREET

P O BOX 155

OTSEGO

MI 49078-0155

PHONE: 6166926141

KEITH KLING

CPCODE: 25204

WORKORDER # 106267

APT DOC # NF74M

CUST MANIFEST:

STATE MANIFEST: MI3624147

DATE OF REPORT: 02/20/96

SALESMAN: BRENT BRODIE

HOLD BACK: 0%

ITEM	PRDIYPE	CNT	DESCRIPTION	SERIAL/DRUM #	WT/LBS	LOCAT	SHIPMAN	ARRIVAL	OUT/SRVC	DESTROYD	COSENT	DISPOSAL FACILITY
1	PCAPS	1	L.B.	MC2-1	972	5000000		10/27/95	10/11/95	12/23/95	02/20/96	APTUS INCINERATOR COFFEYVILLE,KS
2	PCAPS	1	CAPS	MC3-1	585	5000000		10/27/95	10/11/95	12/26/95	02/20/96	APTUS INCINERATOR COFFEYVILLE,KS
3	NDCLO	1	TRANS	8685575	2315	399000		10/27/95	10/27/95	01/16/96	02/20/96	DECOMMISSION KS
4	NFUEL	1	TRANS	8685575	1070	0006000		10/27/95	10/27/95	02/10/96	02/20/96	APTUS INCINERATOR COFFEYVILLE,KS

4942

MEN03132

*Describe other
satellite properties.*

The land referred to in this Search, situated in the County of Allegan, Township of Otsego, State of Michigan, is described as follows:

*0354-
023-005-00*

The East 83 feet of the West 181.5 feet of that part of the Northwest 1/4 of the Northeast 1/4 lying South of the N.Y.C.R.R. and North of the Contour 698, Section 23, Town 1 North, Range 12 West. *216*

*0354-
023-
030-00*

That part of the Northwest 1/4 of Section 23 lying South of the New York City Railroad and East of Farmer Street and North of the Kalamazoo River, ALSO the Northwest 1/4 of the Northeast 1/4 lying South of N.Y.C.R.R. and North of the Contour 698, EXCEPT that part of the West 1/2 of the Northeast 1/4 lying North of River Street and South of N.Y.C.R.R., ALSO Island No. 2 of Section 23, Town 1 North, Range 12 West. *2418211-A*

Commencing on the West line of the East 1/2 of the Northeast fractional 1/4 of Section 23, Town 1 North, Range 12 West at a point 17 rods and 17 links South of the North line of the said Section; thence South 73 1/2 degrees East a distance of 267 feet to a fence; thence South 888 feet to the Kalamazoo River; thence Northwesterly along the said river to a point in the West line of the said East 1/2 of the Northeast 1/4; thence North 696 feet to the place of beginning.

*0354-
023-005-10*

Commencing at the Northeast corner of Lot Albert D. Carpenter's; thence Easterly along L.S. and M.S. Railroad 6 7/8 rods; thence Southerly 14 1/2 rods to the Kalamazoo River; thence Westerly along the Kalamazoo River 6 7/8 rods; thence North parallel with said East line of L.S. and M.S. Railroad, place of beginning, Section 23, Town 1 North, Range 12 West. And being premises now described on tax rolls as: The East 113.6 feet of the West 295.1 feet of that part of the Northwest 1/4 of the Northeast 1/4 lying South of N.Y.C.R.R. and North of Contour 698, Section 23, Town 1 North, Range 12 West. *217*

*0354-
023-005-00*

Commencing on the South line of New York Central Railway 295.1 feet East of the North and South 1/4 line; thence East along said Railway to River Street; thence Easterly along River Street to the East line of the West 1/2 of the Northeast 1/4; thence South to Contour Line 698 on the North bank of the Kalamazoo River; thence Westerly along the shore of said Kalamazoo River to a point due South of place of beginning; thence North to the place of beginning, excepting the East 66 feet, Section 23, Town 1 North, Range 12 West. *218*

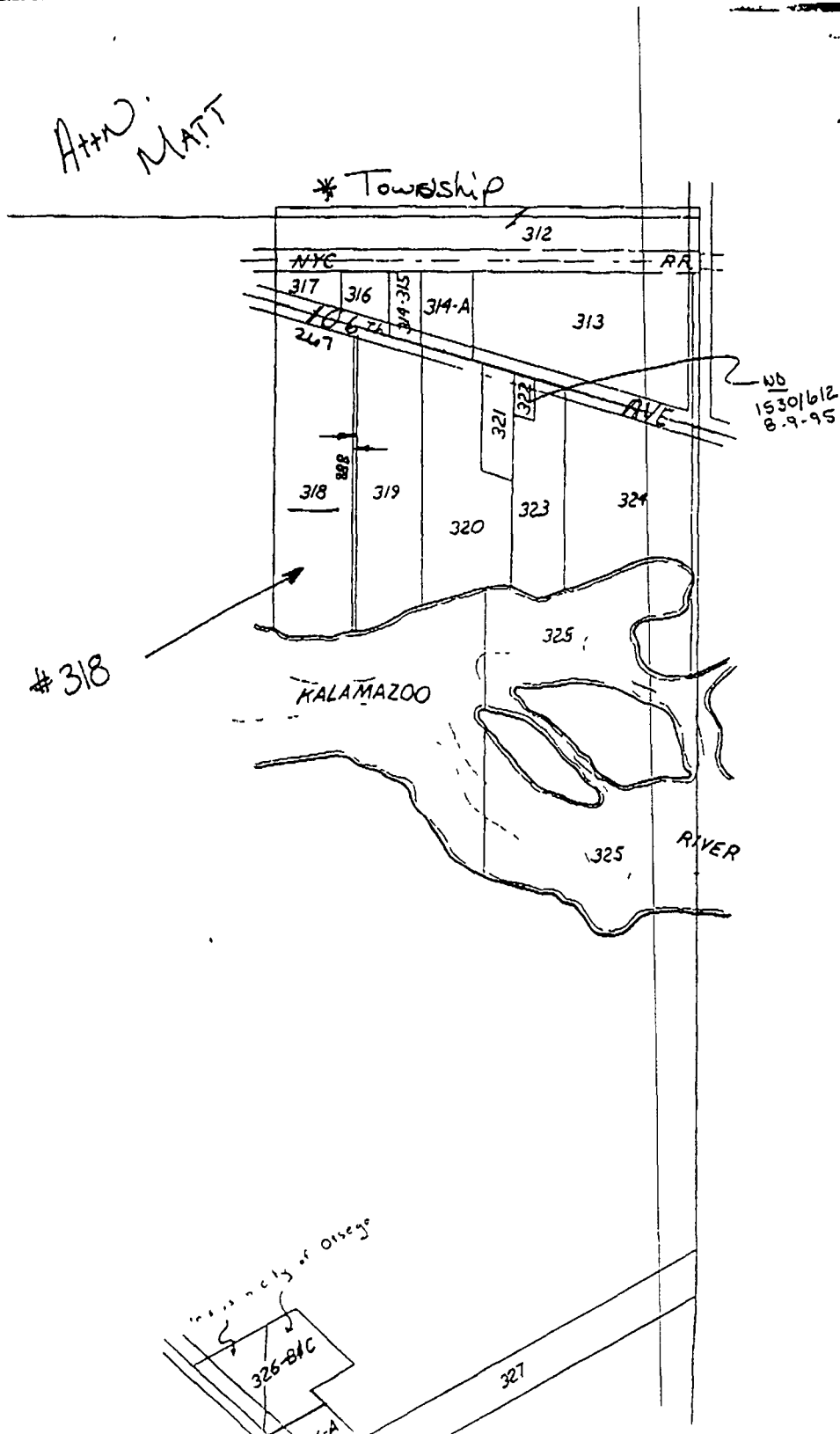
*0354-
023-005-00*

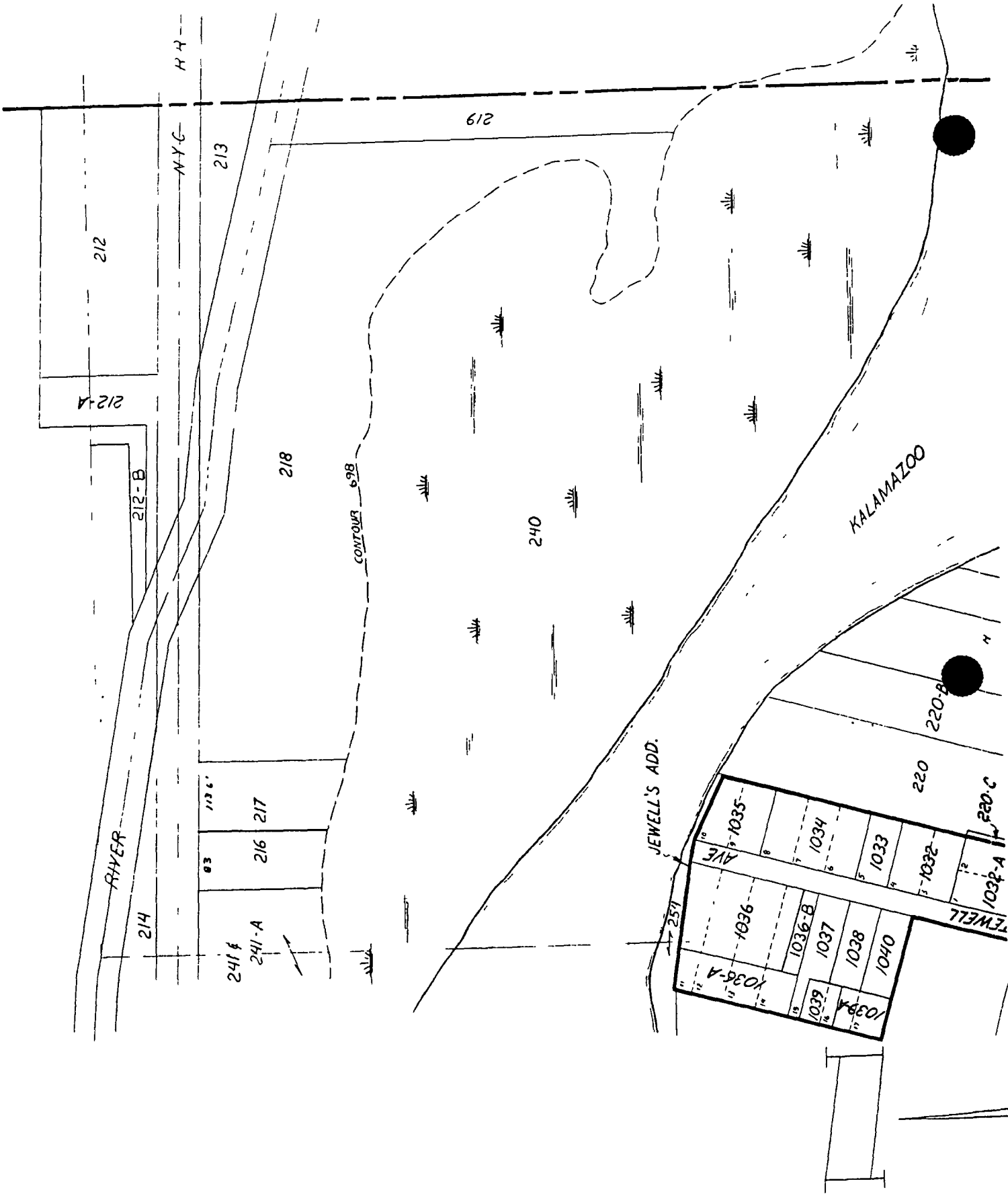
The East 66 feet of that part of the West 1/2 of the Northeast 1/4 lying North of Contour 698 and North of the bank of the Kalamazoo River and South of River Street, Section 23, Town 1 North, Range 12 West. *219*

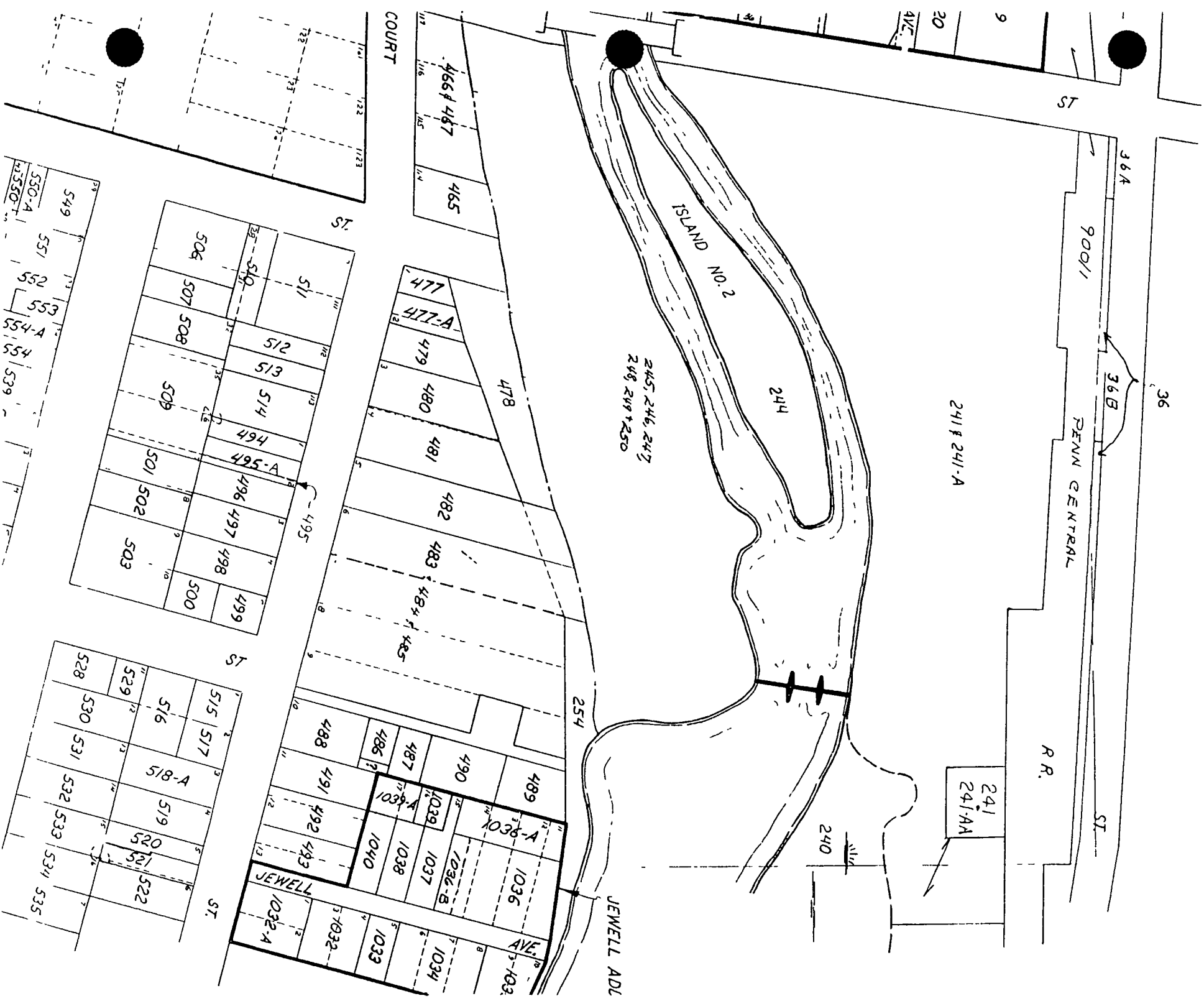
EXHIBIT "A"

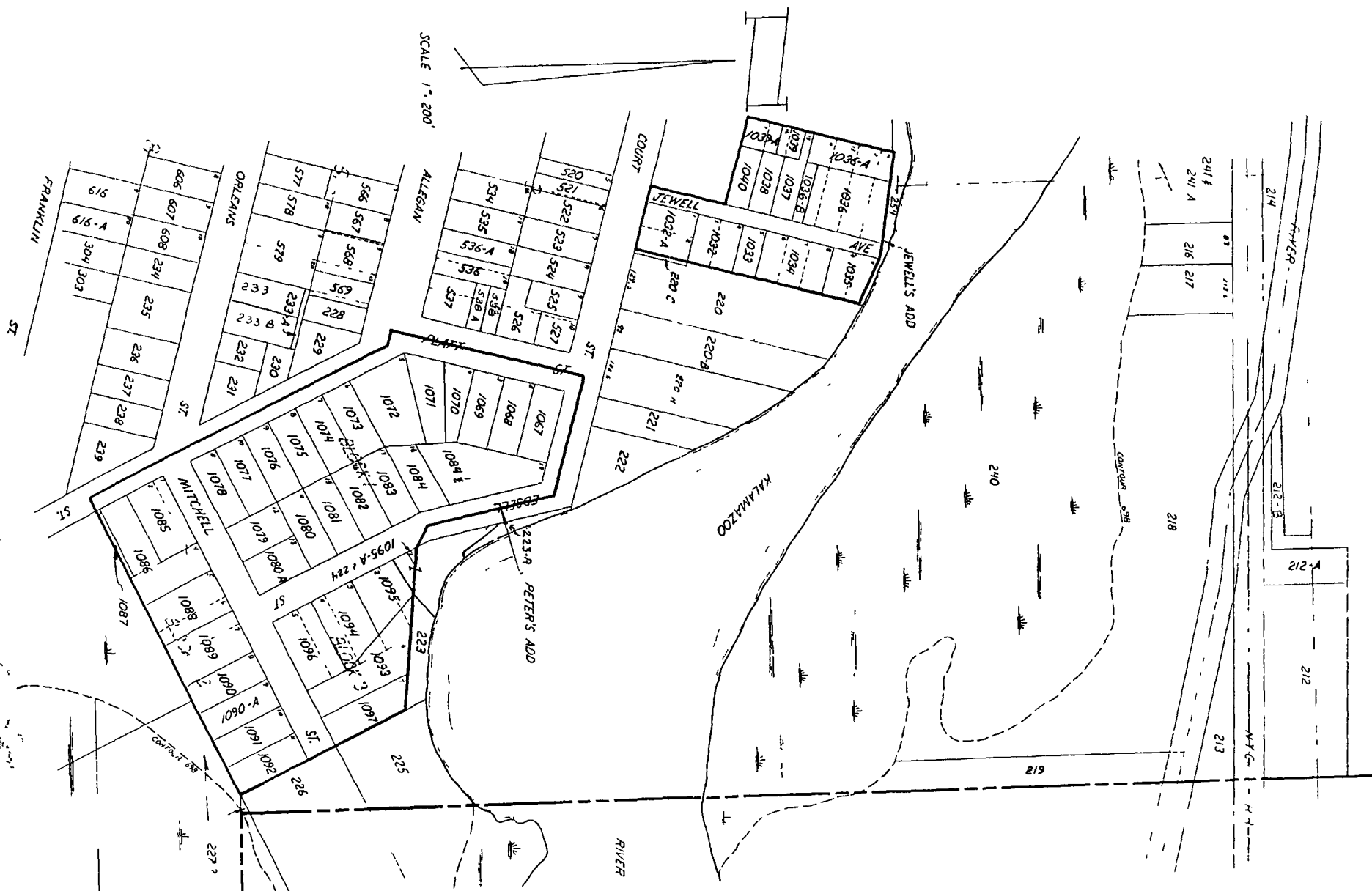
TOTAL P.17

MEN03133



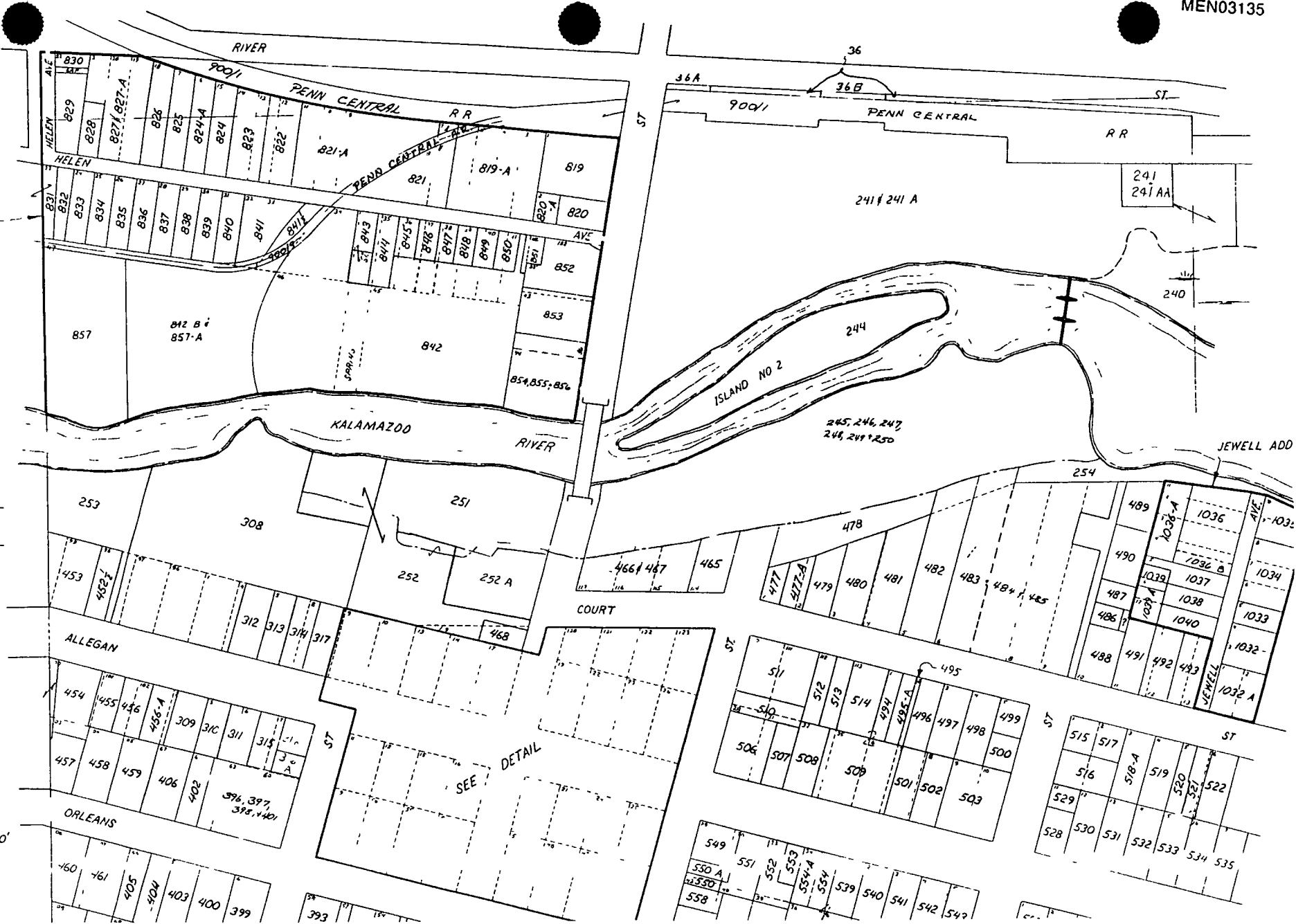






OSSELL'S ADD

SCALE 1"=200'



Memo

PAPERBOARD DIVISION

MENASHA CORPORATION

TO: Keith Kling
Dave Merkel

FROM: Jenny Lang *Jerry*

DATE: March 28, 1996

SUBJECT: Asbestos - Property Inspection Results

The following properties are vacant and do not have buildings or structures within their boundaries.

- 110 Helen Avenue, Otsego
- 33 Fairview Street, Otsego
- 34 Fairview Street, Otsego
- 117 Fairview Street, Otsego
- 129 River Street, Otsego
- 301 N. Farmer Street, Otsego
- 417 N. Farmer Street, Otsego
- 427 N. Farmer Street, Otsego
- 437 N. Farmer Street, Otsego

These properties are all city lots surrounding the mill. They have never been associated with mill processes,

The 16 st. property is a farm 1 mile south of Otsego. It is not used for paper making processes

The following properties have buildings or structures within their boundaries.

- 405 N. Farmer Street, Otsego (pole barn - not insulated)
- 250 S. 16th Street, Otsego (leaf composting area - concrete & tin - not insulated)
- Bruce Smith Properties, Otsego (three structures - concrete & tin - not insulated)
- 222 E. Mosel, Kalamazoo (Old Eaton Warehouse - pipe insulation in area A - area B not insulated)

The Smith property is rented for use as a trailer parking lot.

The following properties have ACM (asbestos containing materials).

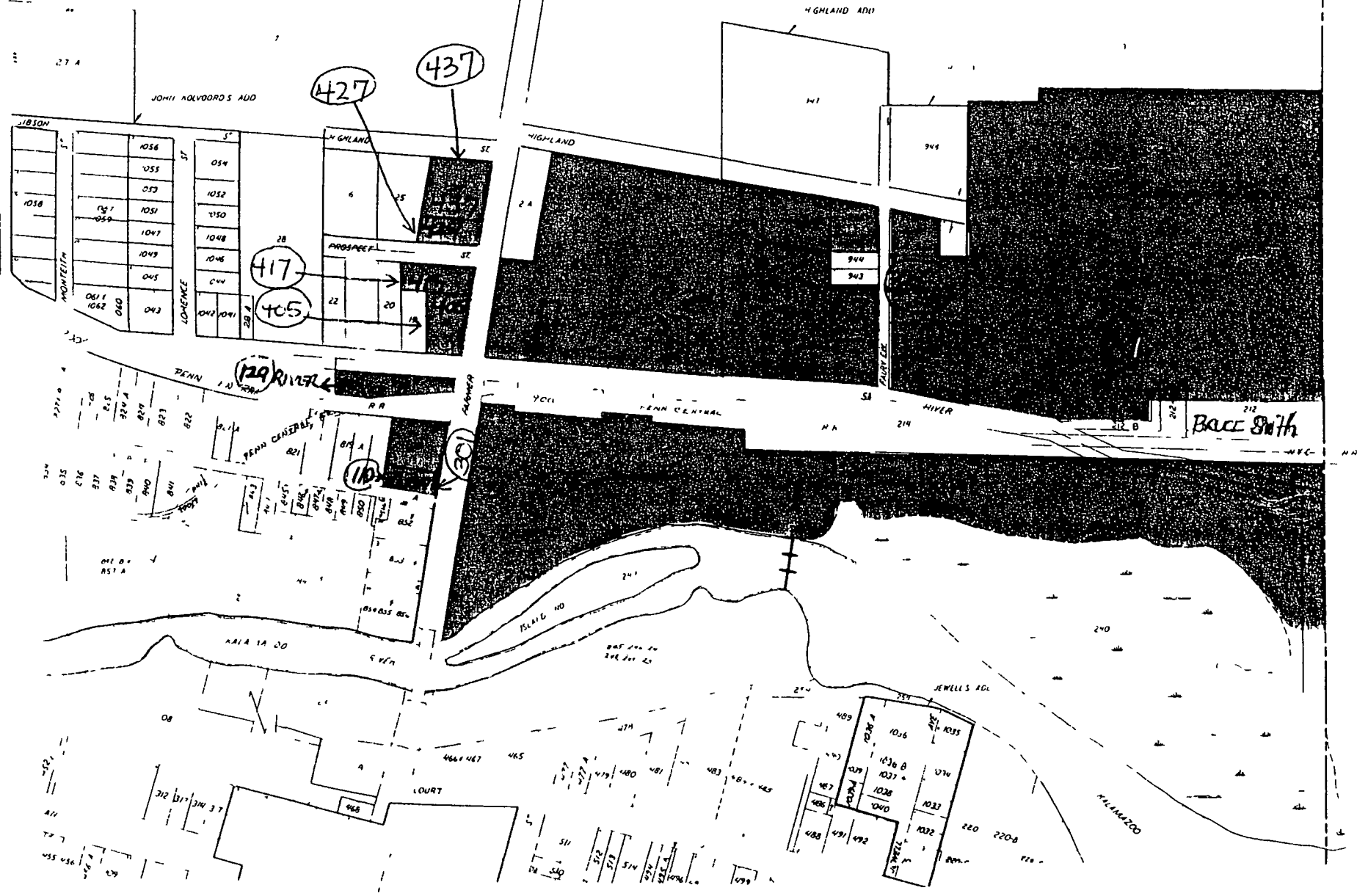
- 222 E. Mosel, Kalamazoo (area A - see attached map)

Menasha, along with other businesses, are renting space inside the building for storage of paper bales. There is no processing done at this site. The first date of use was Oct 31, 1994.

CITY LIMITS

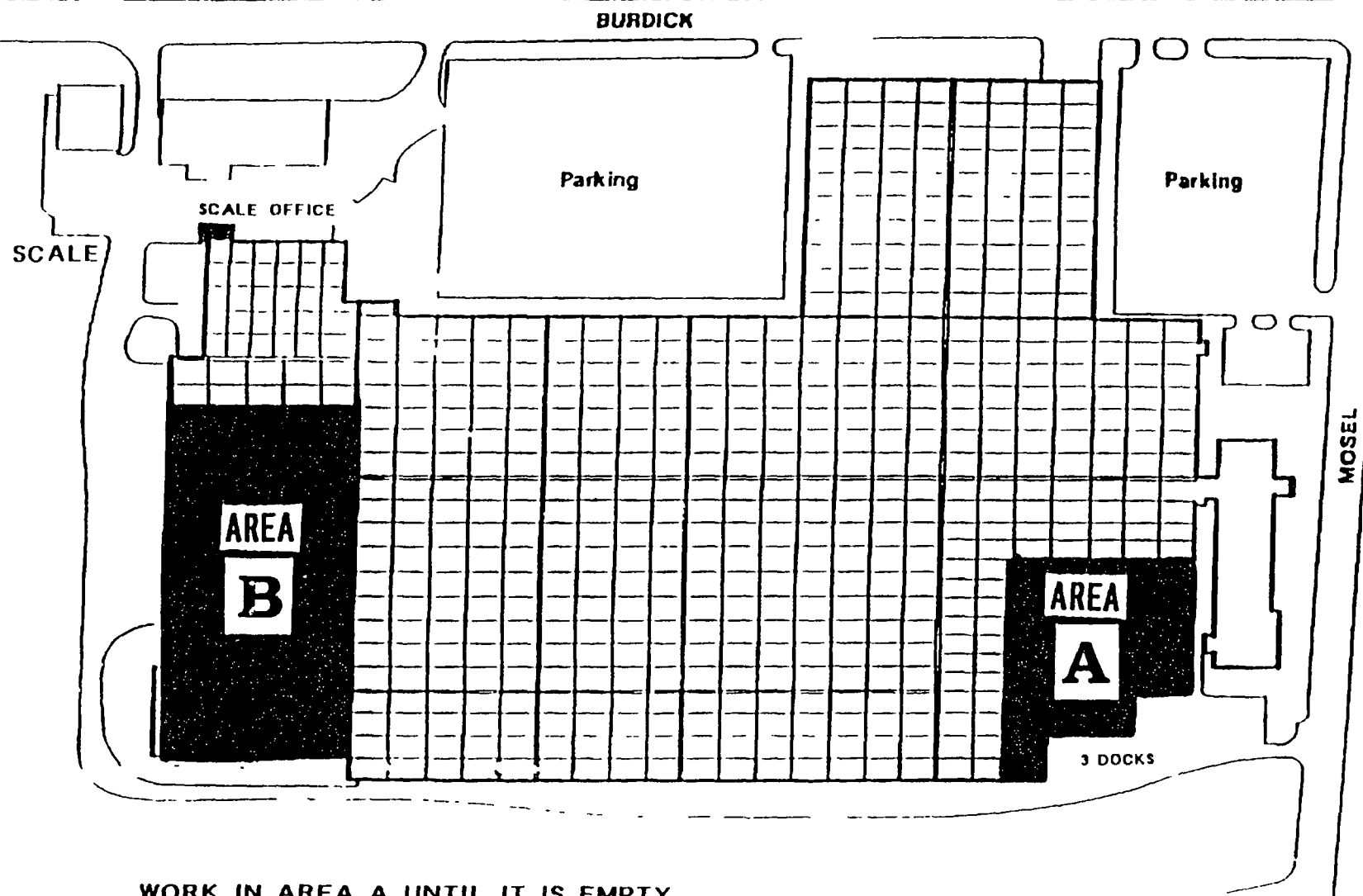


Presently Owned Properties

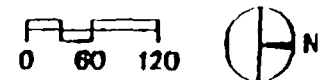


EATON WAREHOUSE

MEN03138



WORK IN AREA A UNTIL IT IS EMPTY



Liberty Industrial Park
Kalamazoo Michigan

RECORDED

1985 AUG 29 PM 2:21

Jay A. Ebert
REGISTER OF DEEDS
ALLEGAN COUNTY, MICH

The Current Delinquent Return Was Not Available For Examination 1866 CHIGAN SIN RACT AND TITLE COMPANY -- SERVING URTON AI

The Grantor **MENASHA CORPORATION**
a **Wisconsin** corporation, whose address is
P.O. Box 367, Hwy. 41, Neenah, Wisconsin
conveys and warrants to **MENASHA 1980 CORPORATION**, a Wisconsin
corporation
whose address is P.O. Box 367, Hwy. 41, Neenah, Wisconsin

the following described premises situated in the City
of **Otsego**, County of **Allegan**
and State of Michigan

(See Attached Legal Description)

THIS CONVEYANCE for no consideration, is made pursuant to corporate reorganization and is exempt from Michigan Transfer Tax.

for the sum of **less than One Hundred Dollars (\$100.00)**
subject to easements and building and use restrictions of record and further subject to **None**

Dated as of the **25th** day of **March**
Signed in presence of

, 1981.

Signed

MENASHA CORPORATION

(Name of Corporation)

By *D. C. Shepard*
President, D. C. Shepard

By *Mowry Smith*
Secretary, Mowry Smith

STATE OF **WISCONSIN**
WINNEBAGO } SS
COUNTY OF **WINNEBAGO**

The foregoing instrument was acknowledged before me this **24th** day of **May**
19 **82**, by **D. C. Shepard** and **Mowry Smith**
(Name(s) of Officer(s))

the **President** and **Secretary** of **Menasha Corporation**
(Title(s) of Officer(s)) (Name of Corporation)

a **Wisconsin** corporation, on behalf of the corporation
(State of Incorporation)

Barb B. Peppel
Notary Public Winnebago
My commission expires August 28, 1983

County Treasurer's Certificate

City Treasurer's Certificate

Tax certification # **10099**
obtained from Allegan County
Treasurer prior to recording

When Recorded Return To
E. Jean Bock, c/o Quarles &
(Name) **Brady**
780 N. Water St.
(Street Address)
Milwaukee WI 53202
(City and State)

Send Subsequent Tax Bills To
Menasha 1980 Corporation
P.O. Box 367, Hwy. 41
Neenah WI 54956

Drafted By
Lawrence J. Jost
Business Address
Quarles & Brady
780 N. Water St.
Milwaukee WI 53202

All those certain pieces of parcels of land situated in Allegan County, Otsego Township, Township 1 North, Range 12 East, Section 14, City of Otsego, Michigan, known and described as follows:

354-114-028-00

PARCEL #1: Beginning at the intersection of the south line of River Street, 66 feet wide, and the east line of Farmer Street, 82.5 feet wide; Thence S 86° 30' E, along the south line of River Street, 100 feet to a point; Thence S 9° 14' W, parallel to Farmer Street, 13.36 feet, to a point; Thence N 86° 30' W, parallel to River Street, 100 feet to a point in the east line of Farmer Street; Thence N 9° 14' E, along the east line of Farmer Street, 13.36 feet to the point of beginning, and containing 0.031 acres, more or less.

PARCEL #2: Beginning at a point in the south line of River Street, 66 feet wide, said point lying S 86° 30' E, 355.70 feet from the intersection of the east line of Farmer Street, 82.5 feet wide, and the south line of River Street (66 feet wide); Thence S 86° 30' E 150 feet along the south line of River Street, to a point; Thence S 3° 43' 45" W, 13.30 feet to a point; Thence N 86° 30' W, parallel to the south line of River Street, 150 feet to a point; Thence N 3° 43' 45" E 13.30 feet to the point of beginning, and containing 0.046 acres, more or less.

PARCEL #3: Beginning at a point in the east line of Farmer Street, said point lying S 9° 14' W, 65.60 feet from the intersection of the south line of River Street, 66 feet wide, and the east line of Farmer Street, 82.5 feet wide, said point of beginning also being 43.50 feet north; measured perpendicularly from the Kalamazoo, Allegan and Grand Rapids Railroad Company's main line as now exists; Thence S 86° 16' 15" E parallel to and 43.5 feet, measured at right angles from the center line of said main line, 100 feet to a point; Thence S 9° 14' W, parallel to Farmer Street, 18.59 feet to a point, said point being northerly 25 feet, measured at right angles from the center line of the said main line; Thence S 86° 16' 15" E, 262.10 feet, parallel to and 25 feet northerly of the center line of said main line, to a point; Thence N 3° 43' 45" E, 18.5 feet to a point; Thence S 86° 16' 15" E, 150 feet to a point; Thence S 3° 43' 45" W 18.5 feet, to a point, said point being 25 feet, measured at right angles to center line of said main line; Thence S 86° 16' 15" E, 25.88, feet, parallel to and 25 feet northerly, measured at right angles to said main line, to a point; Thence, on a curve, concave to the north, whose radius is 7614.49 feet, chord bearing S 87° 14' 04" E, 256.11 feet, arc 256.12 feet, parallel to and 25 feet northerly from the center line of main line, to a point; Thence S 1° 48' 07" W, 83.0 feet to a point, said point being southerly, measured at right angles from the center line of said main line, 58.0 feet; Thence, on a curve concave to the north, radius 7697.49 feet, chord bearing N 87-14-04 W. 258.90 feet, arc 258.92 parallel to and southerly 58.0 feet from the center line of the said main line, to a point; Thence N 86° 16' 15" W, parallel to, and southerly 58.0 feet, measured at right angles from the said main line, 492.74 feet, to a point; Thence N 3° 43' 45" E, 3.0 feet to a point, said point being southerly 55.0 feet measured at right angles from the said main line; Thence, N 86° 16' 15" W, parallel to and southerly 55.0 feet, measured at right angles from said main line, 54.0 feet to a point in the easterly line of Farmer Street; Thence N 9° 14' E, along the easterly line of Farmer Street, 80.37 feet to the point of beginning, and containing 1.624 acres, more or less.

Containing a total area of 1.701 acres, more or less.

The Current Delinquent 'n Was
Not Available For Examination

G. 1095

MEN03141

RECORDED

1985 OCT 18 PM 1 26

Joyce A. Edwards
REGISTER OF DEEDS
ALLEGAN COUNTY MICH

WARRANTY DEED FOR CORPORATION -862

The Grantor **MENASHA CORPORATION**
a **Wisconsin** corporation, whose address is
P.O. Box 367, Hwy. 41, Neenah, Wisconsin
conveys and warrants to **MENASHA 1980 CORPORATION**, a Wisconsin
corporation
whose address is P.O. Box 367, Hwy. 41, Neenah, Wisconsin
the following described premises situated in the City
of **Otsego** County of **Allegan**
and State of Michigan

(See attached legal description)

The Current Delinquent Return Was
Not Available For Examination

THIS CONVEYANCE for no consideration, is made pursuant to corporate
reorganization and is exempt from Michigan Transfer Tax.

for the sum of **less than One Hundred Dollars (\$100.00)**
subject to easements and building and use restrictions of record and further subject to **None**

Dated as of the **25th** day of **March**, 1981.
Signed in presence of

Signed

*
*
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MENASHA CORPORATION
(Name of Corporation)
By *D. C. Shepard*
Its **President, D. C. Shepard**
By *Mowry Smith*
Its **Secretary, Mowry Smith**

STATE OF ~~WISCONSIN~~ **WISCONSIN** }
COUNTY OF **WINNEBAGO** } SS

The foregoing instrument was acknowledged before me this **24th** day of **May**,
19 **82**, by **D. C. Shepard** and **Mowry Smith**
(Name(s) of Officer(s))

the **President** and **Secretary** of **Menasha Corporation**
(Title(s) of Officer(s)) (Name of Corporation)
a **Wisconsin** corporation, on behalf of the corporation
(State of Incorporation)

Barbara B. Popple
Notary Public, **Winnebago** County,
Wisconsin
My commission expires **August 28, 1983**

County Treasurer's Certificate

City Treasurer's Certificate

Tax certification # **10521**
obtained from Allegan County
Treasurer prior to recording

When Recorded Return To
E. Jean Bock, c/o Quarles & Brady
(Name)
780 N. Water St.
(Street Address)
Milwaukee WI 53202
(City and State)

Send Subsequent Tax Bills To
Menasha 1980 Corporation
P.O. Box 367, Hwy. 41
Neenah WI 54956

Drafted By
Lawrence J. Jost
Business Address
Quarles & Brady
780 N. Water St.
Milwaukee WI 53202

Commencing 462 feet south 86-1/2 degrees east of Farmer Street on the north line of River St.; thence North 9 degrees east 330 feet; thence north 86-1/2 degrees west 33 ft.; thence North 9 degrees east to Highland St.; thence Easterly along said street to the Northwest corner of Lot 1 Highland Addition; thence South to a point 214.5 feet North of River St.; thence North 86-1/2 degrees West 99 ft.; thence South 49.5 feet; thence North 86-1/2 degrees West 66 ft.; thence South 165 ft. to River St.; thence Westerly to beginning, Section 14 T1N, R12W.

Commencing on the North side of River Street, 6 rods West of the Southwest corner of Lot 1, Highland Addition to the Village of Otsego, Michigan, and running northerly parallel with the West side of Highland Addition 10 rods, thence Westerly at right angles 4 rods, thence Southerly parallel with the East line to the North side of River Street, thence Easterly along the North side of River Street to starting point, Section 14, T1N, R12W. 1/4 acre of land, more or less.

Commencing at a point on the North line of River Street 16 rods East of the East line of Farmer Street on the Southeast 1/4 of the Southwest 1/4 of Section 14, Town 1 North, Range 12 West, thence Northerly 20 rods, thence East parallel with River Street 4 rods, thence South 20 rods to the North line of River Street, thence West on said line to place of beginning.

Commencing 330 feet South 79-1/2 degrees East of Farmer Street and on the South line of Highland Street, thence South 79-1/2 degrees East along Highland Street 99 feet, thence South 9 degrees West to a point 330 feet along said line from River Street, thence North 86-1/2 degrees West 99.7 feet, thence North 9 degrees East to Beginning, except the Northerly 115.5 feet, Section 14, Town 1 North, Range 12 West, .39 acres.

Commencing at the quarter post between Sections 14 and 23, Town 1 North, Range 12 West, running south on the quarter line to the north line of L. S. & M. S. RR: (now NYC RR), thence easterly along north line of said railroad about 14 rods to a point due south of the former west line of George Mason's land, formerly owned by Mary Baird, thence north to the south side of the highway known as River Street, thence westerly along the south side of River Street to the quarter section line first mentioned.

Commencing 148.5 feet south 86-1/2 degrees east of Farmer Street on the north line of River Street, thence South 86-1/2 degrees east 49-1/2 feet, thence north 9 degrees east 181.5 feet, thence north 86-1/2 degrees west 49-1/2 feet, thence south 9 degrees west 181.5 feet to the place of beginning, Section 14 T1N, Range 12 West.

The east 66 feet of that part of the West half of the Northeast quarter lying North of contour 698 and north of bank of Kalamazoo River and south of River Street, Section 23, Town 1 North, Range 12 West, City of Otsego.

Commencing at the northeast corner of lot Albert D. Carpenter's thence Easterly along L.S. and M.S. Railroad 6-7/8 rods, thence Southerly 14-1/2 rods to Kalamazoo River, thence Westerly along Kalamazoo River 6-7/8 rods, thence North parallel with said East line to L.S. and M.S. Railroad, place of beginning, Section 23, Town 1 North, Range 12 West. **

Commencing on south line of NY Central Railway 295.1 feet east of north and south quarter line, thence east along said Railway to River Street, thence easterly along River Street to east line of west half of northeast quarter, thence south to contour line 698 on north bank of Kalamazoo River, thence westerly along shore of said Kalamazoo River to a point due south of place of beginning, thence north to place of beginning, excepting the east 66 feet, Section 23, Town 1 North, Range 12 West.

**And being premises now described on tax rolls as: The East 113.6 feet of West 295.1 feet of that part of the Northwest quarter of the Northeast quarter lying South of N.Y.C.R.R. and North of contour 698, Section 23, Town 1 North, Range 12 West.

WARRANTY DEED FOR CORPORATION -862

(State Bar of Michigan Form)

The Grantor **MENASHA CORPORATION**
 a **Wisconsin** corporation whose address is
P.O. Box 367, Hwy. 41, Neenah, Wisconsin
 conveys and warrants to **MENASHA 1980 CORPORATION, a Wisconsin**
corporation
 whose address is **P.O. Box 367, Hwy. 41, Neenah, Wisconsin**

the following described premises situated in the Township
 of **Otsego** County of **Allegan**
 and State of Michigan

Land bounded on the East by land formerly owned by George Eddy, South by highway,
 West by land formerly owned by J. W. Halstead, North by railroad formerly known
 as L.S. & M.S.R.R., being 3/4 acre more or less;

Also commencing at Northeast corner of land formerly owned by Grote at South
 line of railroad formerly known as L.S. & M.S.R.R., thence Easterly along South
 line of railroad 18 feet, thence Southerly to Southeast corner of said land
 formerly owned by Grote, being center of highway running Easterly from City of
 Otsego on North side of Kalamazoo River; thence Northerly on East line of formerly
 Grote land to place of beginning on North half of Northeast Quarter, both of
 the foregoing parcels of land being in Section 23, Town 1 North, Range 12 West.
 Said land described for tax purposes as: Commencing at the center of River
 Road at the East 1/8th line, thence South 74° East 209 feet, thence North 168
 feet to South line of N.Y.C.R.R., thence West to East 1/8th line, thence South
 122 feet to place of beginning.

for the sum of less than One Hundred Dollars (\$100.00)

subject to easements and building and use restrictions of record and further subject to None

THIS CONVEYANCE for no consideration, is made pursuant to corporate
 reorganization and is exempt from Michigan Transfer Tax.

Dated as of the 25th day of March

1981.

Signed in presence of

Signed

MENASHA CORPORATION

(Name of Corporation)

GRANTOR

By

D. C. Shepard

Its **President, D. C. Shepard**

By

Mowry Smith

Its **Secretary, Mowry Smith**

STATE OF WISCONSIN

SS

COUNTY OF **WINNEBAGO**

The foregoing instrument was acknowledged before me this **24th** day of **May**

19**82** by **D. C. Shepard** and **Mowry Smith**

(Name(s) of Officer(s))

the **President**
 (Title(s) of Officer(s))

and

Secretary

of **Menasha Corporation**

(Name of Corporation)

a **Wisconsin** corporation on behalf of the corporation
 (State of Incorporation)

Notary Public

Winnebago

~~NOTARY~~ Wisconsin

My commission expires August 28, 1983

County Treasurer's Certificate

City Treasurer's Certificate

Tax certification # **6750**

was obtained from the Allegan
 County Treasurers office prior
 to recording this document

When Recorded Return To

✓ **E. Jean Bock, c/o Quarles &**

(Name) **Brady**

780 N. Water St.

(Street Address)

Milwaukee WI 53202

(City and State)

Send Subsequent Tax Bills To

Menasha 1980 Corporation

P.O. Box 367, Hwy. 41

Neenah WI 54956

Drafted By

Lawrence J. Jost

Business Address

Quarles & Brady, Atty.
780 N. Water St.

Milwaukee WI 53202

RTON ABS CT AND TITLE COMPANY -- SERVING N IIGAN SINCE 66

LIBR 1058 PAGE 318

MEN03144

WARRANTY DEED FOR CORPORATION - 862 (State Bar of Michigan Form)

The Grantor, **MENASHA CORPORATION** corporation, whose address is
a **WISCONSIN**
P.O. Box 367, Hwy. 41, Neenah, Wisconsin
conveys and warrants to **MENASHA 1980 CORPORATION**, a Wisconsin
CORPORATION
whose address is P.O. Box 367, Hwy. 41, Neenah, Wisconsin
the following described premises situated in the City
of **Otsego** County of **Allegran**
and State of Michigan

RECEIVED OF DEEDS
CLERK
JAN 21 1981
JAN 21 1981

Commencing 24 rods East of the intersection of the North line of River Street and the East line of Farmer Street in the City of Otsego, Michigan, thence North 20 rods, thence East parallel with River Street 4 rods, thence South 20 rods, thence West 4 rods to place of beginning.

(Above being same premises described on tax roll as: City of Otsego, Commencing 396 feet South 86-1/2 degrees East of Farmer Street on North line of River Street, thence South 86-1/2 degrees East 66 feet, thence North 9 degrees East 330 feet, thence North 86-1/2 degrees West 66 feet, thence South 9 degrees West 330 feet to beginning, Section 14, Town 1 North, Range 12 West.)

THIS CONVEYANCE for no consideration, is made pursuant to corporate reorganization and is exempt from Michigan Transfer Tax.

for the sum of **Less than One Hundred Dollars (\$100.00)** subject to easements and building and use restrictions of record and further subject to **None**

Dated as of the **25th** day of **March**, **1981**.
Signed in presence of _____ Signed _____

* **MENASHA CORPORATION** GRANTOR
(Name of Corporation)
By **AL Shepard**
Is **President**
By **AL Shepard**
Is **Secretary, Mowry Smith**

STATE OF WISCONSIN
~~XXXXXXXXXXXX~~
COUNTY OF **WINNEBAGO** SS

The foregoing instrument was acknowledged before me this **24th** day of **May** **1982** by **D. C. Shepard** and **Mowry Smith**
(Name(s) of Officer(s))

the **President** and **Secretary** of **Menasha Corporation**
(Title(s) of Officer(s)) (Name of Corporation)

a **Wisconsin** corporation, on behalf of the corporation
(State of Incorporation)
Notary Public **Winnebago**
~~XXXXXXXXXXXX~~ **WISCONSIN**
My commission expires **August 28, 1983**

County Treasurer's Certificate
Tax certification # **6754**
was obtained from the Allegran
County Treasurers office prior
to recording this document

When Recorded Return To (Name) E. Jean Brock, c/o Quarles & Brady (Street Address) 780 N. Water St. (City and State) Milwaukee WI 53202	Send Subsequent Tax Bills To Menasha 1980 Corporation P.O. Box 367, Hwy. 41 Neenah WI 54956	Drafted By Lawrence J. Jost Business Address Quarles & Brady 780 N. Water St. Milwaukee WI 53202
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WARRANTY DEED FOR CORPORATION -862

(State Bar of Michigan Form)

The Grantor **MENASHA CORPORATION**
 a **Wisconsin** corporation, whose address is
P.O. Box 367, Hwy. 41, Neenah, Wisconsin
 conveys and warrants to **MENASHA 1980 CORPORATION**, a Wisconsin
 corporation
 whose address is **P.O. Box 367, Hwy. 41, Neenah, Wisconsin**

the following described premises situated in the Township
 of **Otsego** County of **Allegan**
 and State of Michigan

1: CONDUIT

AUG 5 12 42 PM '82

REGISTER OF DEEDS
 ALLEGAN COUNTY MICH

Commencing on the West line of the East one-half of the northeast fractional one quarter of Section 23, Town 1 North, Range 12 West at a point 17 rods and 17 links south of the North line of the said Section; thence South 73-1/2 degrees East a distance of 267 feet to a fence, thence South 888 feet to Kalamazoo River; thence Northwesterly along the said river to a point in the West line of the said East one-half of the Northeast one-quarter; thence North 696 feet to the place of beginning.

Subject to conditions, restrictions, limitations and easements of record.

THIS CONVEYANCE for no consideration, is made pursuant to corporate reorganization and is exempt from Michigan Transfer Tax.

for the sum of **less than One Hundred Dollars (\$100.00)**
 subject to easements and building and use restrictions of record and further subject to **None**

Dated as of the **25th day of March**

1981.

Signed in presence of

Signed

Tax certification # **2769**
 was obtained from the Allegan
 County Treasurers office prior
 to recording this document

MENASHA CORPORATION

(Name of Corporation)

By **D. C. Shepard**
 Its **President, D. C. Shepard**

By **Mowry Smith**
 Its **Secretary, Mowry Smith**

WISCONSIN
 STATE OF ~~MICHIGAN~~ } SS
 COUNTY OF **WINNEBAGO**

The foregoing instrument was acknowledged before me this **24th** day of **May**
1982, by **D. C. Shepard** and **Mowry Smith**
 (Name(s) of Officer(s))

the **President** and **Secretary** of **Menasha Corporation**
 (Title(s) of Officer(s)) (Name of Corporation)

a **Wisconsin** corporation, on behalf of the corporation
 (State of Incorporation)

Notary Public,
Winnebago
 My commission expires **August 28, 1983**

County Treasurer's Certificate

City Treasurer's Certificate

When Recorded Return To
E. Jean Bock, c/o Quarles &
 (Name) **Brady**
780 N. Water St.
 (Street Address)
Milwaukee WI 53202
 (City and State)

Send Subsequent Tax Bills To
Menasha 1980 Corporation
P.O. Box 367, Hwy. 41
Neenah WI 54956

Drafted By
Lawrence J. Jost
 Business Address
Quarles & Brady
780 N. Water St.
Milwaukee WI 53202

BU' TON ABSTR T AND TITLE COMPANY -- SERVING MIC' SAN SINCE 19

MAKE YOUR REAL ESTATE TRANSFERS SAFE BY USING BURTON TITLE INSURANCE

The Grantor **MENASHA CORPORATION**
 a **Wisconsin** corporation, whose address is
P.O. Box 367, Hwy. 41, Neenah, Wisconsin
 conveys and warrants to **MENASHA 1980 CORPORATION**, a Wisconsin
 corporation
 whose address is **P.O. Box 367, Hwy. 41, Neenah, Wisconsin**
 the following described premises situated in the **City**
 of **Otsego** County of **Allegan**
 and State of Michigan

AUG 5 12 42 PM '82

James A. Wertz
 REGISTER OF DEEDS
 ALLEGAN COUNTY MICH

Beginning on a point on the South line of Section 14 T1N, R12W
 470.12 feet East of the South quarter post, thence North 337.41
 feet to a point 852.98 feet West of the North and South 8th line
 of the Southeast quarter of said Section, thence East 470.00 feet,
 thence South 231.81 feet, thence West 150.00 feet, thence South 105.6
 feet to the Section line, thence West 320.00 feet to the place of
 beginning.

THIS CONVEYANCE for no consideration, is made pursuant to corporate
 reorganization and is exempt from Michigan Transfer Tax.

for the sum of **less than One Hundred Dollars (\$100.00)**
 subject to easements and building and use restrictions of record and further subject to **None**

Dated as of the **25th** day of **March**

, 1981

Signed in presence of

Signed

* Tax certification # 2762
 was obtained from the Allegan
 County Treasurers office prior
 to recording this document

MENASHA CORPORATION

(Name of Corporation)

GRANTOR

By *D. C. Shepard*

Its **President, D. C. Shepard**

By *Mowry Smith*

Its **Secretary, Mowry Smith**

WISCONSIN
STATE OF ~~MISSOURI~~ } SS
 COUNTY OF **WINNEBAGO**

The foregoing instrument was acknowledged before me this **24th** day of **May**
 19 **82**, by **D. C. Shepard** and **Mowry Smith**
 (Name(s) of Officer(s))

the **President** and **Secretary** of **Menasha Corporation**
 (Title(s) of Officer(s)) (Name of Corporation)

a **Wisconsin** corporation, on behalf of the corporation
 (State of Incorporation)

Notary Public,
~~Missouri~~ Wisconsin

My commission expires

Robert B. Bopp
 Winnebago County,
 August 28, 1983

County Treasurer's Certificate

City Treasurer's Certificate

When Recorded Return To
E. Jean Bock, c/o Quarles &
 (Name) **Brady**
780 N. Water St.
 (Street Address)
Milwaukee WI 53202
 (City and State)

Send Subsequent Tax Bills To
Menasha 1980 Corporation
P.O. Box 367, Hwy. 41
Neenah WI 54956

Drafted By
Lawrence J. Jost
 Business Address
Quarles & Brady
780 N. Water St.
Milwaukee WI 53202

Tax Parcel # _____ Recording Fee _____ Transfer Tax _____

CURTON ABS ACT AND TITLE COMPANY -- SERVING "CHIGAN SINC '866

MADE FOR KRAL ESTATE TRUST LISCASE BY USING BURTON TITLE INSURANCE

AUG 5 12:42 PM '87

J. J. J. J.

REG. STER OF DEEDS
ALLEGAN COUNTY MICH

The Grantor MENASHA CORPORATION
a Wisconsin corporation, whose address is
P.O. Box 367, Hwy. 41, Neenah, Wisconsin
conveys and warrants to MENASHA 1980 CORPORATION, a Wisconsin
corporation
whose address is P.O. Box 367, Hwy. 41, Neenah, Wisconsin

the following described premises situated in the City
of Ostego, County of Allegan
and State of Michigan

Beginning at a point on the South line of Section 14, T1N, R12W
470.12 feet East of the South quarter post of said Section, thence
East on said Section line 320.00 feet, thence South and parallel to
the North South 8th line of the Southeast quarter of said Section
54.29 feet, thence West parallel to said Section line 320.00 feet,
thence North 54.29 feet to place of beginning.

THIS CONVEYANCE for no consideration, is made pursuant to corporate
reorganization and is exempt from Michigan Transfer Tax.

for the sum of less than One Hundred Dollars (\$100.00)
subject to easements and building and use restrictions of record and further subject to None

Dated as of the 25th day of March
Signed in presence of

1981.

Signed

* Tax certification # 276/
was obtained from the Allegan
County Treasurers office prior
to recording this document

MENASHA CORPORATION
(Name of Corporation)

By D. C. Shepard

Its President, D. C. Shepard

By [Signature]

Its Secretary, Mowry Smith

WISCONSIN
STATE OF ~~MICHIGAN~~ } SS
COUNTY OF WINNEBAGO

The foregoing instrument was acknowledged before me this 24th day of May
19 82, by D. C. Shepard and Mowry Smith
(Name(s) of Officer(s))

the President and Secretary of Menasha Corporation
(Title(s) of Officer(s)) (Name of Corporation)
a Wisconsin corporation, on behalf of the corporation
(State of Incorporation)

Baeburn B. Popple

Notary Public, Winnebago County,
Michigan Wisconsin
My commission expires August 23, 1983

County Treasurer's Certificate

City Treasurer's Certificate

When Recorded Return To
E. Jean Bock, c/o Quarles &
(Name) Brady
780 N. Water St.
(Street Address)
Milwaukee WI 53202
(City and State)

Send Subsequent Tax Bills To
Menasha 1980 Corporation
P.O. Box 367, Hwy. 41
Neenah WI 54956

Drafted By
Lawrence J. Jost
Business Address
Quarles & Brady
780 N. Water St.
Milwaukee WI 53202

Tax Parcel # _____ Recording Fee _____ Transfer Tax _____

* TYPE OR PRINT NAMES UNDER SIGNATURES

BURTON ABSTRACT AND TITLE COMPANY - SERVING MICHIGAN SINCE 1900

MAKE YOUR REAL ESTATE TRANSFERS SAFE BY USING BURTON TITLE INSURANCE

WARRANTY DEED FOR CORPORATION -862

(State Bar of Michigan Form)

REC'D:

AUG 5 12 42 PM '82

Joyce A. Utz
 REGISTER OF DEEDS
 ALLEGAN COUNTY MICH

The Grantor **MENASHA CORPORATION**
 a **Wisconsin** corporation, whose address is
P.O. Box 367, Hwy. 41, Neenah, Wisconsin
 conveys and warrants to **MENASHA 1980 CORPORATION**, a Wisconsin
 corporation
 whose address is **P.O. Box 367, Hwy. 41, Neenah, Wisconsin**
 the following described premises situated in the City
 of **Otsego** County of **Allegan**
 and State of Michigan

Commencing on the North line of the highway now East River Street
 at the SW corner of Lot 1, Highland Addition to the Village
 of Otsego, Michigan, thence N'y along the West side of Lot 1, 10 rods,
 thence W'y at right angles and parallel with River Street 6 rods, thence
 S'y parallel with the East line 10 rods to the North side of River St.,
 thence E'y 6 rods to place of beginning.

Also, commencing 165 feet North of the SW corner of Lot 1, Highland
 Addition, thence North 49-1/2 feet, thence North 86-1/2 degrees West 99
 feet, thence South 49-1/2 feet, thence South 86-1/2 degrees East to
 beginning, Section 14, T1N, R12W, containing .11 acre.

THIS CONVEYANCE for no consideration, is made pursuant to corporate
 reorganization and is exempt from Michigan Transfer Tax.

for the sum of less than One Hundred Dollars (\$100.00)
 subject to easements and building and use restrictions of record and further subject to None

Dated as of the 25th day of March

1981.

Signed in presence of

Signed

* Tax certification # 2760
 was obtained from the Allegan
 County Treasurers office prior
 to recording this document

MENASHA CORPORATION

(Name of Corporation)

By D. C. Shepard
 Its President, D. C. Shepard

By Mowry Smith
 Its Secretary, Mowry Smith

WISCONSIN
 STATE OF ~~MISSOURI~~ } SS
 COUNTY OF WINNEBAGO

The foregoing instrument was acknowledged before me this 24th day of May
 1982, by D. C. Shepard and Mowry Smith
 (Name(s) of Officer(s))

the President and Secretary of Menasha Corporation
 (Title(s) of Officer(s)) (Name of Corporation)

a Wisconsin corporation, on behalf of the corporation
 (State of Incorporation)

Rachun B. Pepples
 Notary Public, Winnebago County,
Wisconsin
 My commission expires August 28, 1983

County Treasurer's Certificate

City Treasurer's Certificate

When Recorded Return To
E. Jean Bock, c/o Quarles &
 (Name) Brady
780 N. Water St.
 (Street Address)
Milwaukee WI 53202
 (City and State)

Send Subsequent Tax Bills To
Menasha 1980 Corporation
P.O. Box 367, Hwy. 41
Neenah WI 54956

Drafted By
Lawrence J. Jost
 Business Address
Quarles & Brady
780 N. Water St.
Milwaukee WI 53202

CT AND TITLE COMPANY -- SERVING MICHIGAN SINCE 1966

MAKE YOUR REAL ESTATE TRANSFERS SAFE BY USING BURKON TITLE INSURANCE

(State Bar of Michigan Form)

MEN03149

AUG 5 12 42 PM '87

J. J. Little
 REGISTER OF DEEDS
 ALLEGAN COUNTY MICH.

Commencing at the Northeast corner of Farmer and River Streets, thence Northerly on the East side of Farmer Street, 11 rods, thence Easterly parallel with River Street 3 rods, thence Southerly parallel with Farmer Street 11 rods, thence Westerly along the North side of River Street 3 rods to place of beginning, being on Section 14, Town 1 North Range 12 West;

Commencing 49-1/2 feet south 86-1/2 degrees East of Farmer Street on North line of River Street, thence south 86-1/2 degrees East 99 feet, thence North 9 degrees East 181-1/2 feet, thence North 86-1/2 degrees West 99 feet, thence

for the sum of less than One Hundred Dollars (\$100.00)
subject to easements and building and use restrictions of record and further subject to None
THIS CONVEYANCE for no consideration, is made pursuant to corporate
reorganization and is exempt from Michigan Transfer Tax.
Dated as of the 25th day of March, 1981.

Signed

MENASHA CORPORATION
(Name of Corporation) **GRANTOR**
By *D. E. Sheppard*
* President, D. E. Sheppard
By *[Signature]*
* Secretary, Mowry Smith

The foregoing instrument was acknowledged before me this 24th day of May, 1982 by D. C. Shepard and Mowry Smith
(Name(s) of Officer(s))

the President and Secretary of Menasha Corporation
(Title(s) of Officer(s)) (Name of Corporation), a corporation organized under the laws of the State of Wisconsin.

a Wisconsin corporation on behalf of the corporation
(State of Incorporation)

Notary Public,
Winnebago County, Wisconsin
My commission expires August 28, 1983

City Treasurer's Certificate

Drafted By
Lawrence J. Jost

Business Address
Quarles & Brady
780 N. Water St.
Milwaukee WI 53202

Transfer Tax

MEN03150

The Grantor **MENASHA CORPORATION**
a **Wisconsin** corporation, whose address is
P.O. Box 367, Hwy. 41, Neenah, Wisconsin
conveys and warrants to **MENASHA 1980 CORPORATION, a Wisconsin**
corporation
whose address is **P.O. Box 367, Hwy. 41, Neenah, Wisconsin**

the following described premises situated in the **City**
of **Otsego**, County of **Allegan**
and State of **Michigan**

AUG 5 12 42 PM '82

John A. Weller
REGISTER OF DEEDS
ALLEGAN COUNTY MICH

Township One North, Range 12 West, Section 14 Commencing Three Hundred Thirty (330) feet South 79-1/2 degrees East from Farmer Street on South line of Highland Street, thence South 79-1/2 degrees East along Highland 99 feet, thence South 9 degrees West 115.5 feet; thence North 79-1/2 degrees West 99 feet, thence North 9 degrees East 115.5 feet to beginning. Containing .26 of an acre.

THIS CONVEYANCE for no consideration, is made pursuant to corporate reorganization and is exempt from Michigan Transfer Tax.

for the sum of **less than One Hundred Dollars (\$100.00)**
subject to easements and building and use restrictions of record and further subject to **None**

Dated as of the **25th** day of **March**
Signed in presence of

. 1981

Signed

* Tax certification # **2757**
was obtained from the **Allegan**
County Treasurers office prior
to recording this document

MENASHA CORPORATION
(Name of Corporation)
By *D.C. Shepard*
Its **President, D. C. Shepard**
By *[Signature]*
Its **Secretary, Mowry Smith**

STATE OF WISCONSIN
~~Michigan~~ } SS
COUNTY OF **WINNEBAGO**

The foregoing instrument was acknowledged before me this **24th** day of **May**
19 **82** by **D. C. Shepard** and **Mowry Smith**
(Name(s) of Officer(s))

the **President** and **Secretary** of **Menasha Corporation**
(Title(s) of Officer(s)) (Name of Corporation)
a **Wisconsin** corporation, on behalf of the corporation
(State of Incorporation)

Rachael B. Appleton
Notary Public, **Winnebago** County,
~~Winnebago~~ **Wisconsin**
My commission expires **August 28, 1983**

County Treasurer's Certificate

City Treasurer's Certificate

When Recorded Return To
E. Jean Bock, c/o Quarles &
(Name) **Brady**
780 N. Water St.
(Street Address)
Milwaukee WI 53202
(City and State)

Send Subsequent Tax Bills To
Menasha 1980 Corporation
P.O. Box 367, Hwy. 41
Neenah WI 54956

Drafted By
Lawrence J. Jost
Business Address
Quarles & Brady
780 N. Water St.
Milwaukee WI 53202

Tax Parcel # _____ Recording Fee _____ Transfer Tax _____

JRTON ABS ACT AND TITLE COMPANY -- SERVING 'CHIGAN SINCE 1866

MAKE YOUR REAL ESTATE TRANSFERS SAFE BY USING BURTON TITLE INSURANCE

WARRANTY DEED FOR CORPORATION -862

(State Bar of Michigan Form)

MEN03151

The Grantor **MENASHA CORPORATION**
 a **Wisconsin** corporation, whose address is
P.O. Box 367, Hwy. 41, Neenah, Wisconsin
 conveys and warrants to **MENASHA 1980 CORPORATION, a Wisconsin**
corporation
 whose address is **P.O. Box 367, Hwy. 41, Neenah, Wisconsin**

the following described premises situated in the **City**
 of **Otsego** **County of Allegan**
 and State of Michigan

AUG 5 12 42 PM '82

James A. Allen
 REGISTER OF DEEDS
 ALLEGAN COUNTY MICH

Commencing at a point 16 rods North of the intersection of Farmer and River Streets, thence running North on the East side of Farmer Street to Highland Ave., thence East along the South side of Highland Avenue 20 rods, thence South parallel with Farmer Street to a point 20 rods North of the North line of River Street, thence West parallel with River Street 8 rods, thence South parallel with Farmer Street to a point 14 rods North of the North line of River Street, thence West parallel with River Street to place of beginning, excepting parcel therefrom heretofore sold described as: Commencing 16 rods North of the intersection of Farmer Street and River Street on the SW 1/4 of Sec. 14, T1N, R12W, thence North on the East side of Farmer Street, 66 feet, thence East ppl. with River Street 198 feet, thence South 66 feet ppl. with Farmer Street, thence West to beginning, and also excepting and reserving to first party herein the West 100 feet, of premises above described.

THIS CONVEYANCE for no consideration, is made pursuant to corporate reorganization and is exempt from Michigan Transfer Tax.

for the sum of **less than One Hundred Dollars (\$100.00).**

subject to easements and building and use restrictions of record and further subject to **None**

Dated as of the **25th** day of **March**

1981.

Signed in presence of

Signed

* **Tax certification # 2758**
 was obtained from the Allegan
 County Treasurers office prior
 to recording this document

MENASHA CORPORATION
 (Name of Corporation)
 By *D. C. Shepard*
 Its **President, D. C. Shepard**
 By *Mowry Smith*
 Its **Secretary, Mowry Smith**

WISCONSIN
STATE OF ~~MISSOURI~~ } SS
COUNTY OF WINNEBAGO

The foregoing instrument was acknowledged before me this **24th** day of **May**
1982 by **D. C. Shepard** and **Mowry Smith**
 (Name(s) of Officer(s))

the **President** and **Secretary** of **Menasha Corporation**
 (Title(s) of Officer(s)) (Name of Corporation)
 a **Wisconsin** corporation, on behalf of the corporation
 (State of Incorporation)

Robert B. Pepper
 Notary Public, **Winnebago** County,
~~Missouri~~ **Wisconsin**
 My commission expires **August 28, 1983**

County Treasurer's Certificate

City Treasurer's Certificate

When Recorded Return To
E. Jean Bock, c/o Quarles &
 (Name) **Brady**
780 N. Water St.
 (Street Address)
Milwaukee WI 53202
 (City and State)

Send Subsequent Tax Bills To
Menasha 1980 Corporation
P.O. Box 367, Hwy. 41
Neenah WI 54956

Drafted By
Lawrence J. Jost
 Business Address
Quarles & Brady
780 N. Water St.
Milwaukee WI 53202

Tax Parcel #

Record Fee

Transfer Tax

IRTON ABS- ACT AND TITLE COMPANY -- SERVING MICHIGAN SINCE 1866

MAKE YOUR REAL ESTATE TRANSFERS SAFE BY USING DUPLICATION TITLE INSURANCE

RECORDED

AUG 5 12 42 PM '82

John A. Zitar
REGISTER OF DEEDS
ALLEGAN COUNTY, MICH.

The Grantor **MENASHA CORPORATION**
a **Wisconsin** corporation, whose address is
P.O. Box 367, Hwy. 41, Neenah, Wisconsin
conveys and warrants to **MENASHA 1980 CORPORATION**, a Wisconsin
corporation
whose address is P.O. Box 367, Hwy. 41, Neenah, Wisconsin
the following described premises situated in the City of
of **Otsego** County of **Allegan**
and State of Michigan

Commencing 11 rods North of the Northeast corner of Farmer and River Streets
on the East side of Farmer Street, thence Easterly parallel with River Street
12 rods, thence Northerly 3 rods, thence Westerly 12 rods, thence Southerly
along the East side of Farmer Street 3 rods to place of beginning;

Also a parcel described as:

Commencing 16 rods North of the intersection of Farmer Street and River Street
on the Southwest 1/4 of Section 14, Township 1 North, Range 12 West, thence
North on the East side of Farmer Street 66 feet, thence East parallel with
River Street 198 feet, thence South 66 feet parallel with Farmer Street, thence
West to Beginning.

THIS CONVEYANCE for no consideration, is made pursuant to corporate
reorganization and is exempt from Michigan Transfer Tax.

for the sum of less than One Hundred Dollars (\$100.00)
subject to easements and building and use restrictions of record and further subject to None

Dated as of the 25th day of March
Signed in presence of

. 19 81.

Signed

* Tax certification # 2756
* was obtained from the Allegan
County Treasurers office prior
to recording this document

MENASHA CORPORATION
(Name of Corporation)
By *D. C. Shepard*
Its President, **D. C. Shepard**
By *Mowry Smith*
Its Secretary, **Mowry Smith**

STATE OF ~~WISCONSIN~~ } SS
COUNTY OF **WINNEBAGO**

The foregoing instrument was acknowledged before me this 24th day of May
19 82 by D. C. Shepard and Mowry Smith
(Name(s) of Officer(s))

the President and Secretary of Menasha Corporation
(Title(s) of Officer(s)) (Name of Corporation)
a Wisconsin corporation, on behalf of the corporation
(State of Incorporation)

* Notary Public, **Winnebago** County,
~~Menasha~~ **Wisconsin**
My commission expires August 28, 1983

County Treasurer's Certificate

City Treasurer's Certificate

When Recorded Return To
E. Jean Bock, c/o Quarles &
(Name) **Brady**
780 N. Water St.
(Street Address)
Milwaukee WI 53202
(City and State)

Send Subsequent Tax Bills To
Menasha 1980 Corporation
P.O. Box 367, Hwy. 41
Neenah WI 54956

Drafted By
Lawrence J. Jost
Business Address
Quarles & Brady
780 N. Water St.
Milwaukee WI 53202

WARRANTY DEED FOR CORPORATION -862

(State Bar of Michigan Form)

MEN03153

RECORDED

AUG 5 12 42 PM '82

J. A. Z. Z. Z.

REGISTER OF DEEDS
ALLEGAN COUNTY, MICH

The Grantor MENASHA CORPORATION

a Wisconsin

corporation, whose address is

P.O. Box 367, Hwy. 41, Neenah, Wisconsin

conveys and warrants to MENASHA 1980 CORPORATION, a Wisconsin

corporation

whose address is P.O. Box 367, Hwy. 41, Neenah, Wisconsin

the following described premises situated in the City

of Otsego

County of Allegan

and State of Michigan

Commencing 330 feet south 86-1/2 degrees east of Farmer Street, on the north line of River Street, thence south 86-1/2 degrees east 66 feet, thence north 9 degrees east 330 feet, thence north 86-1/2 degrees west 66 feet, thence south 9 degrees west 330 feet to beginning, Section 14, Town 1 North, Range 12 West.

THIS CONVEYANCE for no consideration, is made pursuant to corporate reorganization and is exempt from Michigan Transfer Tax.

Tax certification # 2755
was obtained from the Allegan
County Treasurers office prior
to recording this document

for the sum of less than One Hundred Dollars (\$100.00)
subject to easements and building and use restrictions of record and further subject to None

Dated as of the 25th day of March

1981

Signed in presence of

Signed

MENASHA CORPORATION

(Name of Corporation)

By

D. C. Shepard

Its

President, D. C. Shepard

By

Mowry Smith

Its

Secretary, Mowry Smith

STATE OF WISCONSIN

COUNTY OF WINNEBAGO

SS

The foregoing instrument was acknowledged before me this 24th day of May

1982

by

D. C. Shepard

and

Mowry Smith

(Name(s) of Officer(s))

the President

and

Secretary

of Menasha Corporation

(Title(s) of Officer(s))

a

Wisconsin

corporation, on behalf of the corporation

(State of Incorporation)

Robert B. Peppas

Notary Public,

Winnebago Wisconsin

My commission expires

August 28,

County Treasurer's Certificate

City Treasurer's Certificate

When Recorded Return To

E. Jean Bock, c/o Quarles &

(Name)

Brady

780 N. Water St.

(Street Address)

Milwaukee WI 53202

(City and State)

Send Subsequent Tax Bills To

Menasha 1980 Corporation

P.O. Box 367, Hwy. 41

Neenah WI 54956

Drafted By

Lawrence J. Jost

Business Address

Quarles & Brady

780 N. Water St.

Milwaukee WI 53202

B' TON ABSTR T AND TITLE COMPANY -- SERVING MICHIGAN SINCE 1917

MAKE YOUR REAL ESTATE TRANSFERS SAFE BY USING BOBSON TITLE INSURANCE

WARRANTY DEED FOR CORPORATION -862

(State Bar of Michigan Form)

MEN03154

RECORDED

AUG 5 12 42 PM '82

John A. Warr
 REGISTER OF DEEDS
 ALLEGAN COUNTY MICH

The Grantor **MENASHA CORPORATION**
 a **Wisconsin** corporation, whose address is
 P.O. Box 367, Hwy. 41, Neenah, Wisconsin
 conveys and warrants to **MENASHA 1980 CORPORATION**, a Wisconsin
 corporation
 whose address is P.O. Box 367, Hwy. 41, Neenah, Wisconsin

the following described premises situated in the City
 of Otsego, County of Allegan
 and State of Michigan

Lot Number One Highland Addition to the Village, now City, of Otsego.

Lot Number 2 of Highland Addition being in Section 14 Town 1 North, Range 12 West, according to the plat thereof recorded in Liber 3 of Plats at page 24 in the Office of Register of Deeds for Allegan County, Michigan.

Lot #3 of Highland Addition to the Village (now city) of Otsego, according to the plat thereof recorded in Liber 3 of Plats on page 24 in the Office of the Register of Deeds for Allegan County, Michigan.

Lots #4, 5 and 6 of Highland Addition to the Village (now City) of Otsego, reserving a strip of land 60 feet wide off the North end of lots above mentioned, according to the plat thereof recorded in Liber 3 of Plats on page 24 in the Office of the Register of Deeds for Allegan County, Michigan.

(See continuation of legal description on reverse)

for the sum of less than One Hundred Dollars (\$100.00)

subject to easements and building and use restrictions of record and further subject to None
 THIS CONVEYANCE for no consideration, is made pursuant to corporate reorganization and is exempt from Michigan Transfer Tax.

Dated as of the 25th day of March, 19 81.

Signed in presence of

Signed

* Tax certification # 2770
 was obtained from the Allegan
 County Treasurers office prior
 to recording this document

MENASHA CORPORATION

(Name of Corporation)

By D. C. Shepard
 Its President, D. C. Shepard

By Mowry Smith
 Its Secretary, Mowry Smith

WISCONSIN
 STATE OF ~~MISSOURI~~ } SS
 COUNTY OF WINNEBAGO

The foregoing instrument was acknowledged before me this 24th day of May
 19 82, by D. C. Shepard and Mowry Smith
 (Name(s) of Officer(s))

the President and Secretary of Menasha Corporation
 (Title(s) of Officer(s)) (Name of Corporation)

a Wisconsin corporation, on behalf of the corporation
 (State of Incorporation)

Richard B. Peppel
 Notary Public, Winnebago
 Wisconsin

My commission expires August 28, 1983

County Treasurer's Certificate

City Treasurer's Certificate

When Recorded Return To
 E. Jean Bock, c/o Quarles &
 (Name) Brady
 780 N. Water St.
 (Street Address)
 Milwaukee WI 53202
 (City and State)

Send Subsequent Tax Bills To
 Menasha 1980 Corporation
 P.O. Box 367, Hwy. 41
 Neenah WI 54956

Drafted By
 Lawrence J. Jost
 Business Address
 Quarles & Brady
 780 N. Water St.
 Milwaukee WI 53202

6
 TON ABSTI IT AND TITLE COMPANY -- SERVING MI' GAN SINCE 196

WARRANTY DEED FOR CORPORATION -862

(State Bar of Michigan Form)

MEN03155

The Grantor **MENASHA CORPORATION**
 a **Wisconsin** corporation, whose address is
P.O. Box 367, Hwy. 41, Neenah, Wisconsin
 conveys and warrants to **MENASHA 1980 CORPORATION**, a Wisconsin
 corporation
 whose address is **P.O. Box 367, Hwy. 41, Neenah, Wisconsin**

the following described premises situated in the City
 of **Otsego** County of **Allegan**
 and State of Michigan

AUG 5 12 42 PM '82

James A. Wicks
 REGISTER OF DEEDS
 ALLEGAN COUNTY MICH

Commencing at a point on the North line of River Street 12 rods East of the
 East line of Farmer Street on the Southeast 1/4 of the Southwest 1/4, Section
 14, Town 1 North, Range 12 West, thence Northerly 20 rods, thence East parallel
 with River Street 4 rods, thence South 20 rods to the North line of River
 Street, West 4 rods to the place of beginning, being in the Township of Otsego,
 County of Allegan, State of Michigan.

THIS CONVEYANCE for no consideration, is made pursuant to corporate
 reorganization and is exempt from Michigan Transfer Tax.

for the sum of **less than One Hundred Dollars (\$100.00)**
 subject to easements and building and use restrictions of record and further subject to **None**

Dated as of the 25th day of March
 Signed in presence of

19 81

Signed

MENASHA CORPORATION

(Name of Corporation) GRANTOR

By *D. C. Shepard*
 Its **President, D. C. Shepard**

By *Mowry Smith*
 Its **Secretary, Mowry Smith**

* Tax certification # *2766*
 * was obtained from the Allegan
 County Treasurers office prior
 to recording this document

STATE OF **WISCONSIN** }
~~Michigan~~ } SS
 COUNTY OF **WINNEBAGO**

The foregoing instrument was acknowledged before me this **24th** day of **May**
 19 **82** by **D. C. Shepard** and **Mowry Smith**
 (Name(s) of Officer(s))

the **President** and **Secretary** of **Menasha Corporation**
 (Title(s) of Officer(s)) (Name of Corporation)
 a **Wisconsin** corporation, on behalf of the corporation
 (State of Incorporation)

Robert B. O'Connell
 Notary Public, **Winnebago** County,
~~Neenah~~ **Wisconsin**
 My commission expires **August 28, 1983**

County Treasurer's Certificate

City Treasurer's Certificate

When Recorded Return To

E. Jean Bock, c/o Quarles &
 (Name) **Brady**
780 N. Water St.
 (Street Address)
Milwaukee WI 53202
 (City and State)

Send Subsequent Tax Bills To

Menasha 1980 Corporation
P.O. Box 367, Hwy. 41
Neenah WI 54956

Drafted By

Lawrence J. Jost

Business Address

Quarles & Brady
780 N. Water St.
Milwaukee WI 53202

RTON ABST CT AND TITLE COMPANY -- SERVING MICHIGAN SINCE 1966

MAKE YOUR REAL ESTATE TRANSFERS SAFE BY USING BURTON TITLE INSURANCE

The Grantor **MENASHA CORPORATION**
a **Wisconsin** corporation, whose address is
P.O. Box 367, Hwy. 41, Neenah, Wisconsin
conveys and warrants to **MENASHA 1980 CORPORATION**, a Wisconsin
corporation
whose address is **P.O. Box 367, Hwy. 41, Neenah, Wisconsin**
the following described premises situated in the City
of **Otsego** County of **Allegan**
and State of Michigan

AUG 5 12 43 PM '82
James A. Wrote
REGISTER OF DEEDS
ALLEGAN COUNTY MICH

Beginning at a point on the south line of Section 14, Town 1 North, Range 12
West 470.12 feet East of the South 1/4 post of said Section, thence East on
the Section line 348.85 feet, thence South and parallel to the North and South
1/8 line of the Southeast 1/4 of said Section 89.4 feet, thence West parallel
and 16.5 feet North of the North line of the N.Y.C. Railroad right of way 243.94
feet to the North line of River Street, thence Westerly on the North Line of
River Street 108.27 feet, thence North 54.29 feet to the place of beginning.

THIS CONVEYANCE for no consideration, is made pursuant to corporate
reorganization and is exempt from Michigan Transfer Tax.

for the sum of **less than One Hundred Dollars (\$100.00)**
subject to easements and building and use restrictions of record and further subject to **None**

Dated as of the **25th** day of **March**
Signed in presence of

. 19 **81**.

Signed

* Tax certification # **2765**
was obtained from the Allegan
County Treasurers office prior
to recording this document

MENASHA CORPORATION
(Name of Corporation)
By *D.C. Shepard*
Its **President, D. C. Shepard**
By *Mowry Smith*
Its **Secretary, Mowry Smith**

WISCONSIN
STATE OF **MENASHA** } SS
COUNTY OF **WINNEBAGO**

The foregoing instrument was acknowledged before me this **24th** day of **May**
19 **82** by **D. C. Shepard** and **Mowry Smith**
(Name(s) of Officer(s))

the **President** and **Secretary** of **Menasha Corporation**
(Title(s) of Officer(s)) (Name of Corporation)

a **Wisconsin** corporation, on behalf of the corporation,
(State of Incorporation)

Robert B. Popple
Notary Public, **Winnebago**
My commission expires **August 28, 1983**

County Treasurer's Certificate

City Treasurer's Certificate

When Recorded Return To
E. Jean Bock, c/o Quarles & Brady
(Name)
780 N. Water St.
(Street Address)
Milwaukee WI 53202
(City and State)

Send Subsequent Tax Bills To
Menasha 1980 Corporation
P.O. Box 367, Hwy. 41
Neenah WI 54956

Drafted By
Lawrence J. Jost
Business Address
Quarles & Brady
780 N. Water St.
Milwaukee WI 53202

The Grantor **MENASHA CORPORATION**
a **Wisconsin** corporation, whose address is
P.O. Box 367, Hwy. 41, Neenah, Wisconsin
conveys and warrants to **MENASHA 1980 CORPORATION, a Wisconsin**
corporation
whose address is **P.O. Box 367, Hwy. 41, Neenah, Wisconsin**
the following described premises situated in the City
of **Otsego**, County of **Allegan**
and State of Michigan

AUG 5 12 43 PM '82

Joyce A. Wertz
REGISTER OF DEEDS
ALLEGAN COUNTY, MICH

0354-014-031 (0)
TITLION ABSTRACT AND TITLE COMPANY - SERVING MICHIGAN SINCE 1866

Beginning at a point on the South line of Section 14, Town 1 North, Range 12 West 760.12 feet East of the South 1/4 post of said Section, thence North parallel to the North and South 1/8 line of the Southeast 1/4 of said Section, 487.41 feet, thence East parallel to the South line of said Section 562.98 feet, thence South on the North and South 1/8 line of said Section 411.81 feet, thence West parallel to the South line of said Section 495 feet, thence South 75.6 feet to the South line of said Section, thence West 58.85 feet to the point of beginning.

THIS CONVEYANCE for no consideration, is made pursuant to corporate reorganization and is exempt from Michigan Transfer Tax.

for the sum of **less than One Hundred Dollars (\$100.00)**
subject to easements and building and use restrictions of record and further subject to None

Dated as of the **25th** day of **March**, 1981.
Signed in presence of

* Tax certification # 2764
was obtained from the Allegan
County Treasurers office prior
* to recording this document

Signed
MENASHA CORPORATION
(Name of Corporation)
By *D.C. Shepard*
Its President, **D. C. Shepard**
By *Mowry Smith*
Its Secretary, **Mowry Smith**

WISCONSIN
STATE OF ~~MICHIGAN~~ } SS
COUNTY OF **WINNEBAGO**

The foregoing instrument was acknowledged before me this **24th** day of **May**, 1982, by **D. C. Shepard** and **Mowry Smith**
(Name(s) of Officer(s))

the **President** and **Secretary** of **Menasha Corporation**
(Title(s) of Officer(s)) (Name of Corporation)
a **Wisconsin** corporation, on behalf of the corporation
(State of Incorporation)

Rochester B. Popple
Notary Public,
~~Winnebago~~ **Wisconsin**
My commission expires **August 28, 1983**

County Treasurer's Certificate

City Treasurer's Certificate

When Recorded Return To E. Jean Bock, c/o Quarles & Brady (Name) 780 N. Water St. (Street Address) Milwaukee WI 53202 (City and State)	Send Subsequent Tax Bills To Menasha 1980 Corporation P.O. Box 367, Hwy. 41 Neenah WI 54956	Drafted By Lawrence J. Jost Business Address: Quarles & Brady 780 N. Water St. Milwaukee WI 53202
---	---	--

Tax Parcel # _____ Recording Fee _____ Transfer Tax _____

MAKE YOUR REAL ESTATE TRANSFERS SAFE BY USING BURTON TITLE INSURANCE

RECORDED

AUG 5 12 43 PM '82

REGISTER OF DEEDS
ALLEGAN COUNTY, MICH

The Grantor **MENASHA CORPORATION**
a **Wisconsin** corporation, whose address is
P.O. Box 367, Hwy. 41, Neenah, Wisconsin
conveys and warrants to **MENASHA 1980 CORPORATION**, a Wisconsin
corporation
whose address is P.O. Box 367, Hwy. 41, Neenah, Wisconsin
the following described premises situated in the **City**
of **Otsego** County of **Allegan**
and State of Michigan

Commencing at a point 27.28 rods east and 29.54 rods north of the south quarter post of Section 14, Town 1 North, Range 12 West, thence north 27.46 rods to land formerly owned by William J. Cushman, thence east 52.72 rods to the 1/8 line, thence south on said 1/8 line to a point 29.54 rods north of the south line of said Section 14, thence west to the place of beginning, together with the right to use for purposes of ingress and egress to said land, the west 20 feet of land described as commencing at a point 27.28 rods east of the south 1/4 post of Section 14, Town 1 North, Range 12 West, thence north 29.54 rods, thence east to the 1/8 line of said Section, thence south on said 1/8 line to said Section line, thence west on said Section line to place of beginning.

And also, Beginning at a point 470.12 feet east and 487.41 feet north of the south quarter post of Section 14, Town 1 North, Range 12 West, thence east 852.98 feet to the North South eighth line of the southeast quarter of said Section,

(See continuance of legal on reverse side)
for the sum of **less than One Hundred Dollars (\$100.00)**
subject to easements and building and use restrictions of record and further subject to **None**

THIS CONVEYANCE for no consideration, is made pursuant to corporate reorganization and is exempt from Michigan Transfer Tax.
Dated as of the 25th day of **March**, 1981.

Signed in presence of

Signed

* Tax certification # **2767**
was obtained from the Allegan
County Treasurers office prior
to recording this document

MENASHA CORPORATION

(Name of Corporation)

By **D. C. Shepard**
Its **President, D. C. Shepard**

By **Mowry Smith**
Its **Secretary, Mowry Smith**

WISCONSIN
STATE OF ~~MICHIGAN~~ } SS
COUNTY OF **WINNEBAGO**

The foregoing instrument was acknowledged before me this **24th** day of **May**
19 **82**, by **D. C. Shepard** and **Mowry Smith**
(Name(s) of Officer(s))

the **President** and **Secretary** of **Menasha Corporation**
(Title(s) of Officer(s)) (Name of Corporation)

a **Wisconsin** corporation, on behalf of the corporation.
(State of Incorporation)

Notary Public
Robert R. Peppel
Winnebago Wisconsin

My commission expires **August 28, 1983**

County Treasurer's Certificate

City Treasurer's Certificate

When Recorded Return To
E. Jean Bock, c/o Quarles & Brady
(Name)
780 N. Water St.
(Street Address)
Milwaukee WI 53202
(City and State)

Send Subsequent Tax Bills To
Menasha 1980 Corporation
P.O. Box 367, Hwy. 41
Neenah WI 54956

Drafted By
Lawrence J. Jost
Business Address
Quarles & Brady
780 N. Water St.
Milwaukee WI 53202

0334-014-030-00
36
WISCONSIN
SERVING M
TITLE COMPANY
ABST

SECTION 1111 INSURANCE

MEN03159

RECORDED

AUG 5 12 43 PM '82

John A. Wozniak
 REGISTER OF DEEDS
 ALLEGAN COUNTY, MICH.

The Grantor **MENASHA CORPORATION**
 a **Wisconsin** corporation, whose address is
 P.O. Box 367, Hwy. 41, Neenah, Wisconsin
 conveys and warrants to **MENASHA 1980 CORPORATION**, a Wisconsin
 corporation
 whose address is P.O. Box 367, Hwy. 41, Neenah, Wisconsin

the following described premises situated in the Township
 of **Otsego** County of **Allegan**
 and State of Michigan:

That certain piece of parcel of land situated in the Township of Otsego, County
 of Allegan, and State of Michigan, described as follows, to-wit:

Commencing at a point in the center of the highway twenty-one (21) rods and
 six (6) feet southeasterly from the Eighth line, thence southeasterly along
 the center of the highway 117 feet, thence north to the south line of the
 Railroad, thence westerly to a point north of the place of beginning, thence
 south to the place of beginning; on the East one-half of the Northeast one-
 quarter of Section Twenty-three (23), Town One (1) North, Range Twelve (12)
 West.

Subject to conditions, limitations, easements and restrictions of record.

THIS CONVEYANCE for no consideration, is made pursuant to corporate
 reorganization and is exempt from Michigan Transfer Tax.

for the sum of less than One Hundred Dollars (\$100.00)
 subject to easements and building and use restrictions of record and further subject to None

Dated as of the 25th day of March, 1981
 Signed in presence of:

Signed:

* Tax certification # 2768
 was obtained from the Allegan
 County Treasurers office prior
 to recording this document

MENASHA CORPORATION

(Name of Corporation)

By: D. C. Shepard
 Its President, D. C. Shepard

By: Mowry Smith
 Its Secretary, Mowry Smith

WISCONSIN
 STATE OF ~~MICHIGAN~~ } SS.
 COUNTY OF WINNEBAGO

The foregoing instrument was acknowledged before me this 24th day of May
 1982, by D. C. Shepard and Mowry Smith
 (Name(s) of Officer(s))

the President and Secretary of Menasha Corporation
 (Title(s) of Officer(s)) (Name of Corporation)

a Wisconsin corporation, on behalf of the corporation.
 (State of Incorporation)

Carlton B. Popple
 Notary Public,
~~Michigan~~ Wisconsin

My commission expires: August 28, 1983

County Treasurer's Certificate

City Treasurer's Certificate

When Recorded Return To:

✓ E. Jean Bock, c/o Quarles &
 (Name) Brady
 780 N. Water St.
 (Street Address)
 Milwaukee WI 53202
 (City and State)

Send Subsequent Tax Bills To:

Menasha 1980 Corporation
 P.O. Box 367, Hwy. 41
 Neenah WI 54956

Drafted By:

Lawrence J. Jost
 Business Address:
 Quarles & Brady
 780 N. Water St.
 Milwaukee WI 53202

F TON ABST T AND TITLE COMPANY - SERVING MICHIGAN SINCE 1926

MAKE YOUR REAL ESTATE TRANSFERS SAFE BY USING BURKION TITLE INSURANCE

WARRANTY DEED FOR CORPORATION -862

(State Bar of Michigan Form)

The Grantor MENASHA CORPORATION

a Wisconsin

corporation, whose address is

P.O. Box 367, Hwy. 41, Neenah, Wisconsin

conveys and warrants to MENASHA 1980 CORPORATION, a Wisconsin corporation

whose address is P.O. Box 367, Hwy. 41, Neenah, Wisconsin

the following described premises situated in the City
of Otsego, County of Allegan
and State of Michigan

Lot #1, Edsell's Addition to Village of Otsego according to the plat thereof
recorded in Liber 2 of Plats on page 26 in the Office of Register of Deeds
for Allegan County, MI.

THIS CONVEYANCE for no consideration, is made pursuant to corporate
reorganization and is exempt from Michigan Transfer Tax.

for the sum of less than One Hundred Dollars (\$100.00)
subject to easements and building and use restrictions of record and further subject to None

Dated as of the 25th day of March

, 1981.

Signed in presence of

Signed

Tax certification # 2763
was obtained from the Allegan
County Treasurers office prior
to recording this document

MENASHA CORPORATION

(Name of Corporation)

By

*

President, D. C. Shepard

By

*

Secretary, Mowry Smith

WISCONSIN
STATE OF ~~MISSOURI~~ } SS
COUNTY OF WINNEBAGO

The foregoing instrument was acknowledged before me this 24th day of May

1982, by D. C. Shepard and Mowry Smith

(Name(s) of Officer(s))

the President and Secretary of Menasha Corporation
(Title(s) of Officer(s)) (Name of Corporation)

a Wisconsin corporation on behalf of the corporation
(State of Incorporation)

Notary Public,
Winnebago Wisconsin

My commission expires

Winnebago State County.

August 28, 1983

County Treasurer's Certificate

City Treasurer's Certificate

When Recorded Return To

E. Jean Bock, c/o Quarles &
(Name) Brady
780 N. Water St.
(Street Address)
Milwaukee WI 53202
(City and State)

Send Subsequent Tax Bills To
Menasha 1980 Corporation
P.O. Box 367, Hwy. 41
Neenah WI 54956

Drafted By
Lawrence J. Jost

Business Address
Quarles & Brady
780 N. Water St.
Milwaukee WI 53202

Tax Parcel #

Recording Fee

Transfer Tax

BURTON ABSTRACT AND TITLE COMPANY -- SERVING MICHIGAN SINCE 1966

MAKE YOUR REAL ESTATE TRANSFERS SAFE BY USING BURTON TITLE INSURANCE

RECORDED

AUG 5 12 43 PM '87

REGISTER OF DEEDS
ALLEGAN COUNTY MICH

 MENASHA CORPORATION

May 17, 1996

VIA FEDERAL EXPRESS

Mr. Jeff Woolstrum
Honigman, Miller, Schwartz & Cohn
2290 First National Building
Detroit, MI 48226-3583

RE: Portage Creek Superfund

Dear Mr. Woolstrum:

Pursuant to your conversation with Glenn Holcombe, enclosed please find Menasha Corporation's Document Retention Policy as well as Warranty Deeds related to the Otsego, Michigan property.

Please let me know if you have any questions regarding the same. Thank you for your assistance regarding this matter.

Very truly yours,



Julie P. Massey
Corporate Paralegal

cc: G. Holcombe

Corporate Office
1645 Bergstrom Road
PO Box 367
Neenah WI 54957-0367
1-414-751-1236
1-800-242-5077 Int'l
1-800-558-5073 Nat'l
1-414-751-1236 Fax

<input checked="checked" type="checkbox"/> All Divisions	<input type="checkbox"/>	Effective Date 8-1-95	Rev No.	Index No. 6010	Page Number 1 of 17
<input type="checkbox"/>	<input type="checkbox"/>	Issued By J. Sarosiek		Approved By R.D. Bero	
Title: DOCUMENT RETENTION POLICY					

1. **POLICY**

Corporate policy is to destroy all records except those specifically authorized to be preserved. Those records "authorized to be preserved" are listed in the attached Records Schedule. This schedule has been approved as the only corporate authority for the retention of records. Official retention periods are as short as possible in order to keep down our records inventory. The longer periods are based upon positive legal, audit, or management requirements.

2. **DEFINITIONS**

- (a) A positive legal requirement means that a specific federal or state law requires us to keep the record; important property rights which the corporation has legal obligations to protect are involved, such as patents, employee pension equities, etc.; or we are aware of a specific, impending claim or legal action. The mere fact that a record is potentially useful in the event of a lawsuit does not constitute a positive legal requirement. Each month the corporation enters thousands of sales, purchase, and freight transactions involving a multitude of records most of which we would have to save for fifteen years if we wanted to be fully armed against every possible legal problem that could arise. As a practical matter, the retention of such records has to be based simply upon the requirements of sound business procedure and they are kept for one to two years - a period long enough to verify performance, to make or receive payment, and to furnish support for the audit of accounts. During this period, probable claims or legal situations will normally be recognized and the records directly concerned with the specific transaction set aside. After this time, if unanticipated legal problems still come up, the

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corporation knowingly assumes the risk of any loss caused by not having records - a loss that should in any event be far less expensive than a massive records storage program.

- (b) Auditing requirements refer to state and federal tax audits, particularly the Federal Government's review of our corporate income tax returns. All records needed for the federal tax audit are retained for "current plus 6 years", a period long enough to cover the statutory three year limitation on the audit plus extensions which are often arranged by separate agreement.
- (c) Management requirements refer to the needs of corporate departments producing records of proprietary, technical, or economic value to future operations of the corporation, e.g., technological research and development, market research and analysis, facilities engineering, etc. The mere fact that people at higher levels of management "might ask for certain records" does not constitute a positive management requirement nor an acceptable reason for saving records that are otherwise disposable.

Most of our corporate records do not fit into the legal, audit, or management requirement classifications described above. They may be vital to current goals and useful for analysis of current operations but are of little or no value to the corporation by the time they are over one year old. Therefore, we have assigned short-term retention categories to a large percentage of the corporation's records.

3. RETENTION AND DISPOSAL PROCEDURE

- (a) The Records Schedule is set up alphabetically. Retention periods are expressed in terms of the number of calendar years plus the current calendar year. If a record is classified as "C plus 2 years", this means that during 1989 all 1988 and 1987 copies will be kept; 1987 copies will be destroyed in January, 1990, and 1988 copies will be thrown out in January, 1991. In other words, there will always be at least two full prior calendar years of a "C plus 2" record on hand, and at least one full prior year of a "C plus 1" record. "Active" means that the record should be kept as long as it is

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actively used, is pertinent or in effect, and has not been superseded by receipt of more up-to-date material.

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- (b) **Annual Records Disposal.** The most important records housekeeping job is the year-end disposal. Each February a year's collection of records in all categories except "Permanent" should be discarded by all corporation offices and locations. The records schedule will be the guide to "Permanent" records, most of which are found in research and technical locations or in a certain headquarters department. Records classified as "Active" should also be culled at year-end even though the life span of "Active" material is not necessarily related to its chronological age. **CAUTION:** Accounting records should not be destroyed without clearance from the Tax Department.
- (c) **Certification.** Each department and operations manager will annually certify in writing to the corporation's Chief Executive Officer that his or her department/operation is in compliance with this Document Retention Policy.

4. PROCEDURE FOR AMENDING THE RECORDS SCHEDULE

In order to assist us in keeping abreast of developments that warrant issuing amendments or changes to the Records Schedule, anyone in the corporation who feels that the retention period governing his or her records should be changed because of changes in legal, auditing, or management requirements, or who feels that a new item should be added to the schedule, should submit the following information to the Legal Department:

- (a) Department or location that has the record.
- (b) Name of record as presently listed on the Records Schedule, or simply a brief description if it is a proposed new item on the schedule.
- (c) Proposed retention period.
- (d) Reason for the proposed retention, including specific citation to the law or regulation and an explanation of the need for the record, who uses it and for what purposes; going into enough detail to give the Legal Department a clear picture of the value of the record.

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5. GENERAL PROVISIONS

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- (a) **Definition of "Record".** A record is written, printed or other documented material (including electronically recorded data) used to provide historical data. All computerized records are subject to the Records Schedule.
- (b) **Creation, Control and Maintenance of Records.** Each department or operating unit is responsible for the creation of records required by the corporation to meet legal, auditing and management requirements, for the control and maintenance of such records, and for the disposal of records that are no longer required. Department and operation files should be purged at least annually.
- (c) **Microfilming.** It is our practice to microfilm or microfiche records only where costs of microfilming are less than retention of original materials and benefits greater.
- (d) **Conducting an Inventory.** Each department/operation must conduct an inventory of the records in its files in order to properly use the Records Schedule. The inventory should be complete and include records in all formats; i.e., paper originals, paper duplicates, microforms, computer tapes, computer printouts, etc. Reference sources, such as library materials, catalogs, magazines, etc., and convenience files which are unofficial files within an employee's desk, should not be included in the inventory. However, official files maintained in an employee's desk are company records and should not be held beyond their approved retention periods. These files also are subject to any applicable legal or tax hold and may be subject to discovery during litigation or official investigation. If such files are maintained within the desk, the holder should inform the department or operations manager of their existence and ensure that the records are maintained in accordance with the Records Schedule.

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- (e) **Maintenance of Original Copy.** When multiple copy records are prepared, only the original copy is to be retained unless otherwise indicated in the Records Schedule. All other copies should be destroyed immediately upon receipt and reading or when their usefulness as a reference source has ceased.
- (f) **Storage Area.** Records with a retention period of more than two years should be transferred from offices to other storage after two years when local conditions warrant it.
- (g) **Labeling.** A label indicating department or operation, record description and the date of destruction will be affixed to each file drawer or transfer case placed in storage.
- (h) **Confidential Records.** If confidential records are to be destroyed, they should be shredded or burned. In certain cases they may be baled and sold as scrap paper.

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RECORDS SCHEDULE

MEN03167

TO

DOCUMENT RETENTION POLICY AND PROCEDURE

Abbreviations:

P	-	Permanent	U/OBS	-	Until Obsolete
AT	-	After Termination	US/O	-	Until Superseded or
U/SUP	-	Until Superseded			Obsolete
C	-	Current Year	***	-	With Tax Clearance
R/T	-	Retirement/Term.	PF	-	Personnel File

RECORD SERIES

RETENTION PERIOD

1099's -----	P
10K Reports - Competitors -----	U/OBS
ADD&D System Reports (Insurance) -----	C + 6
Abstract of Title/Title Opinion -----	P
Accident Files - Trucking -----	C + 4
Accident Records (Employee) -----	R/T + 10
Account Analyses (Finance) -----	C + 4 ***
Account Reconciliation Files (Finance) -----	C + 4 ***
Accounting Distribution Reports -----	C + 4 ***
Accounts Payable Records -----	C + 4 ***
Accounts Receivable Records -----	C + 4 ***
Acknowledgement (Sales) -----	C + 4
Acquisition and Merger Documentation -----	P
Activity Change Reports (Payroll) -----	C
Activity Reports (General) -----	C
Actual Reports (Finance) -----	C + 4 ***
Actuarial Valuations (Employee Benefits) -----	P
Ad Proofs -----	C
Ad Tear Sheets - Competitor -----	U/OBS
Advances - Cash -----	C + 4
Advertising Records (Sales) -----	C + 5
Affirmative Action Plans -----	U/OBS + 1
Agreements/Contracts -----	C + 10
Air Travel Records -----	C + 2
Airline Ticket Refund Requests -----	C + 1
American Paper Institute - Reports -----	C + 1
Analytical Testing Results (R&D) -----	P

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RECORD SERIES

RETENTION PER

MEN03168

Analysts - Financial Reports -----	U/OBS
Annual Reports -----	P
Applications for Determination (Pension) ----	US/O
Applications for Employment -----	C + 1
Appraisals (Insurance) -----	P
Artwork -----	U/OBS
* Asset Inventories -----	P
Association Records - (Trade) -----	C
Audiograms -----	RT + 30
Audit Reports (Finance) -----	P
Authorization to Photograph -----	C + 1
Auto/Truck Orders -----	C + 3
Bank Advices -----	C + 1
Bank Blotters -----	C + 1
Bank Deposit Receipts -----	C + 1
Bank Files - Loan Agreements -----	AT + 6
Bank Reconciliations -----	C + 1
Bank Services Reports (Payroll) -----	C + 1
Bank Trust Statements -----	C + 1
Bids and Quotations -----	C + 2
Billing Summaries -----	C + 2
Billing and Shipping Orders -----	C + 1
Bills of Lading -----	C + 4
Biological Tests and Reports -----	C + 20
Biological Tests and Reports (Medical) -----	RT + 30
Boiler House Efficiency Reports -----	C + 1
Boiler Logs -----	C + 2
Bonds - Fidelity and Surety -----	AT + 4
Brand Histories -----	U/OBS
Budgets -----	P
Building Permits -----	U/OBS + 1
Bulletins to Salespersons -----	C + 1
Business Reports - Annual -----	C + 3
By-Laws (Original/Amendments) -----	P
CPR Recertifications -----	US/O
Call Reports -----	C + 1
Canadian Trademarks -----	P
Cancelled Checks - All -----	C + 4
Captive Insurance Company - Reports -----	U/OBS
Car Rental Reports -----	C + 1
Carrier Performance System Reports -----	C + 2
Cash Distribution Reports (Finance) -----	C + 4 ***
Cash Dividend Registers (Stockholders) -----	C + 4 ***
Cash Receipts (Finance) -----	C + 1
Cashier Records -----	C + 4 ***

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RECORD SERIES

RETENTION PE.

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Certificates - Liability -----	U/OBS
Certificates - Property Insurance -----	U/OBS
Certificates of Title - Auto -----	U/OBS
Change Orders (Purchasing) -----	C + 6
Change Reports (Employee Benefits) -----	PF
Charge Backs (Finance) -----	C + 4 ***
Chart of Accounts -----	C + 1
Charters (Certificates of Incorporation) ----	P
Check Registers -----	C + 4 ***
Check Requests (Finance) -----	C + 1
Chemical Emergency Materials -----	U/OBS
Chemical Hazards Records -----	P
Chemical Right-to-Know Documents -----	P
Chronological Files -----	C + 2
Claims (Employee Insurance) -----	C + 3
Claims (Freight) -----	C + 2
Claims (Advertising) -----	U/OBS
Claims Listing (Employee Benefits) -----	C + 3
Claims and Reports (Liability) -----	C + 4
Claims and Reports (Property) -----	C + 4
Clean-Up Histories -----	P
Cleared Check Lists -----	C + 3
Commission Analyses and Files -----	C + 1
Commodity Sales Summaries -----	C
Company Bulletins/Newsletters -----	C + 1
Compensation History Reference Records -----	C + 1
Compensation Surveys -----	C + 2
Competitive - Audits (Quality) -----	U/OBS
Competitive New Product Data -----	U/OBS
Competitive Price Lists -----	U/OBS
Competitor Files -----	U/OBS
Complaints and Summaries -----	C + 2
Compliance Reports (Dept. of Trans.) -----	C + 2
Compliance Reports (OSHA) -----	C + 3
Compliance Reports (EPA) -----	C + 6
Conference Board Surveys -----	C
Conflict of Interest Records -----	C + 2
Construction Bids (Buildings) -----	C + 3
Construction Work Ledgers -----	P
Consumption Forecasts and Reports -----	C
Contractor's Files (Buildings) -----	C + 2
Contracts -----	AT + 10
Contribution Records (Charitable) -----	C + 7
Copyrights -----	P
Corporate Register and Indexes -----	P
Correspondence -----	C
Cost Accountability Records -----	C + 1
Cost Controls - Manufacturing Statistics ----	C + 1
Cost Reports, Records and Standards -----	C + 1

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RECORD SERIES

RETENTION PERIOD

Cost Savings Reports -----	C + 1
Cost of Manufacturing Reports -----	C + 3
Creative Materials (Advertising/PR) -----	U/OBS
Credit Card Reports -----	C + 3
Credit Cards -----	U/OBS
Credit Files -----	U/OBS + 2
Credit Memo -----	C + 4 ***
Customer Contract Rates Records (Freight) ---	C + 1
Customer Credit Data -----	U/OBS
Customer Orders -----	C + 3
Customer Service Reports (Transportation) ---	C + 3
Customer Summary Reports (Sales) -----	C + 3
Customs Verification Documentation -----	C + 2
Daily Cash Balances -----	C
Daily Sales Records -----	C
Daily Update Reports - Inventory -----	C
Dam Inspections -----	P
Damage Returns Reports -----	C + 2
Data Books (Finance) -----	C + 1
Deduction/Earnings Summaries (Payroll) -----	C
Deeds -----	P
Delay Logs and Reports -----	C + 1
Demurrage Diversion Reports -----	C + 1
Departmental Expense Analyses -----	C + 1
Depreciation Files - Tax -----	C + 4 ***
Depreciation Schedules -----	U/OBS
Determination Letter (Pension Plan) -----	US/O
Discrimination Complaints (Employees) -----	C + 10
Dispatcher's Daily Logs (Transportation) ----	C + 1
Dissolved Parent/Subsidiary Co. Records ----	C + 10
Distributor Agreements -----	AT + 3
Driver Gross Pay Details -----	C + 1
Driver Non-trip Activity Updates -----	C + 1
Driver's Licenses and Testing Data -----	C
Drop and Ship Orders -----	C + 1
EEO - Discrimination Complaints -----	C + 10
EEO - Records and Reports -----	C + 10
ERISA Records -----	P
Earnings and Deduction Records -----	C + 2
Efficiency Reports (Buildings) -----	C + 6
Employee Assistance Program Records -----	C + 3
Employee Attendance Reports -----	PF
Employee Insurance Records -----	PF
Employee Loan Paid Records -----	PF
Employee Personnel Files -----	R/T + 25
Employee Reference and Status Reports -----	PF

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RECORD SERIES

RETENTION PERIOD

Employee Relocation Records -----	PF
Employee Status Change Reports -----	PF
Employee Suggestions -----	PF
Employment/Manpower Reports -----	C + 3
Energy Reports (Utility) -----	C + 2
Engineering Design Files -----	U/OBS
Engineering Design Reports -----	C + 10
Engineering Drawings/Tracings -----	P
Engineering Feasibility Surveys (Buildings) -	C + 3
Enrollment Cards (Insurance) -----	PF
Environmental Check Test Results -----	P
Equal Employment Opportunity Records -----	C + 10
Equipment Failure Reports -----	C + 1
Equipment Specifications -----	U/OBS
Equipment and Driver Master Files -----	U/OBS
Error Log Reports (Sales) -----	C + 2
Expense Authorization Files -----	C + 4 ***
Expense Reports -----	C + 4 ***
Explosive Materials Records -----	C + 3
Export Declarations -----	C + 2
Export/Import Orders -----	C + 2
Express Bills (Freight) -----	C
FDA Records -----	U/OBS
FLSA (Fair Labor Standards Act) Records -----	C + 3
FTC - Publications -----	C
Fact Sheets (Sales) -----	U/OBS
Financial Statements -----	P
Financing Files -----	U/OBS + 1
First Reports of Injury -----	RT + 30
Fleet Car Records -----	C + 3
Fleet Management REcords -----	C + 3
Forecasts/Estimates -----	C + 1
Foreign Country Files -----	U/OBS
Foreign Financial Accounts -----	C + 4 ***
Foreign Liabilities and Claims -----	C + 3
Foreign Sales Corporation Records -----	P
Foreign Travel Employee Records -----	C + 1
Formal Orders of Regulatory Commissions -----	U/OBS
Forms Controls (Masters & Files) -----	U/OBS
Forms Ordered, Records of -----	C + 1
Freight Bills/Rates/Logs -----	C + 3
Freight Status Listings -----	C + 1
Fuel Records - Inventory and Price -----	C + 1
Fuel and Mileage Reports -----	C + 2
Furniture Logs -----	U/OBS

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RECORD SERIES

RETENTION PE.

Garnishments - Notices, etc. -----	PF
General Ledgers and Reports -----	P
General Process Data (Manufacturing) -----	C + 1
Government Activities Reports/Files -----	C + 2
Government Certification Records -----	U/OBS
Government Contracts -----	AT + 4
Government Orders -----	C + 1
Government Proposals and/or Bids -----	C + 1
Government Safety Reports -----	C + 3
Government, Reports to -----	C + 3
Gross Sales Figures -----	C
Group Life Reports -----	C + 1
Guarantees and Warranties - Products -----	U/OBS
Hazard Communication Programs and Stds. -----	P
Hazard Determination Written Procedures -----	US/O
Hazardous Waste Records -----	P
Health Records (Employee) -----	PF
Hourly Time Card Summary Lists -----	C
Hourly Vacation/Sick Leave Adjustments -----	C
House Sales Information -----	PF
Household Moves -----	C + 6
ICC Authorities -----	P
ID Cards (Employees) -----	U/OBS
IRS 5500's, Schedule A's, etc. -----	C + 4 ***
Immigration Records -----	C + 50
Import Duties and Fees -----	C + 3
In-Process Quality Control Manuals -----	US/O
Incentive Earnings Report -----	C + 3
Incident Reports - Computer -----	C + 1
Incident Reports - Security -----	C + 2
Income Statements -----	C + 1
Individual Test Data (Quality) -----	C + 3
Infringements - Patent -----	C + Life of Patent
Inspection Procedures and Records (Quality) -	US/O
Inspections - Buildings and Equipment -----	C + 3
Instrument Calibration Records -----	U/OBS
Instrument Performance Reports -----	C + 1
Insurable Property/Asset Values -----	U/OBS
Insurance Records (Employees) -----	U/OBS
Insurance - Summary Plan Descriptions -----	US/O
Insurance Registers -----	P
Insurance Reports -----	C + 1
Interferences (Patent Cases) -----	C + Life of Patent
International Insurance Program Records -----	C + 3
Interruption Logs and Reports (Mfg.) -----	C + 1
Inventor Books (Patents) -----	P

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RECORD SERIES

RETENTION PER

Inventory Books -----	C + 2
Inventory Controls - Spare Parts -----	C + 1
Inventory Reports -----	C + 3
Invoices - All -----	C + 4 ***
Job Evaluation Cards -----	PF
Job Files (Buildings) -----	C + 3
Job Orders (Purchasing) -----	C + 3
Job Postings -----	C + 3
Journal Entries and Registers -----	C + 4 ***
LIFO Records -----	C + 4 ***
Labor Rate Changes -----	U/OBS
Labor Relations Documentation -----	U/OBS
Laboratory Log Books and Reports (R&D) -----	C + 25
Landfill Monitoring Records -----	P
Leases and Subleases -----	AT + 6
Ledgers - General/Subsidiary Ledgers -----	P
Liability Insurance (US) Reports -----	C + 1
Licensee/Partnership Documentation -----	AT + 6
Licenses/Permits -----	US/O
Litigations/Infringements -----	C + Life of Patent
Load Reports (Freight) -----	C
Long Range Plans and Reports -----	C + 5
Long Term Disability Reports -----	C + 1
Loss Prevention - Inspection Reports -----	C + 2
Loss Runs - Liability Insurance Reports -----	C + 2
Machinery/Equipment Records and Tests -----	U/OBS
Mail and Postage Control Records -----	C + 1
Maintenance Job Costs -----	C + 2
Maintenance Job Orders -----	C + 3
Manpower Reports -----	C
Manuals - Procedural, Process, etc. -----	US/O
Maps, Geological, Natural Gas, Water, etc. --	U/OBS
Marine Cargo - Certificates -----	US/O
Market Sales/Trades Reports -----	C
Marketing Research Records -----	U/OBS
Matching Gift Program Records -----	C + 10
Material Certification to Customers -----	C + 6
Material Safety Data Sheets -----	P
Material and Equipment Lists -----	C + 3
Materials Standards (Purchasing) -----	C + 6
Membership Reports (Associations) -----	C + 3
Memos -----	C
Meter Test Records -----	C + 1
Minority Enterprise Subcontracts -----	C + 10

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RECORD SERIES

RETENTION PERIOD

Minutes - Agendas -----	P
Monthly Reports -----	C
Mortgages -----	U/OBS + 10
Motor Carrier Insurance Certificates -----	US/O
Negatives/Plates -----	C + 10
Negotiations - Employee Insurance -----	C + 40
Net Asset Transfers -----	C + 2
News Releases -----	P
Newspaper Ads (Jobs) -----	C + 6
Noise Survey Reports -----	P
Non-Employee Director Records -----	R/T + 3
Notes Payable and Receivable -----	AT + 6
Notices of Material Received -----	C + 1
Notices of Meetings and Proxy Statements ----	P
OSHA - Compliances and Standards -----	US/O
Obsolete Reports (Material) -----	C + 1
Operational Log Books and Summaries -----	C + 2
Operators' Shift Logs -----	C + 1
Opposition/Litigation/Infringement Files ----	C + Life of Patent
Order Acknowledgement (Sales) -----	C + 6
Organization Directories/Charts, etc. -----	US/O
Packaging Samples -----	C + 4
Packing Lists -----	C
Parts Cards -----	C
Passports -----	PF
Patent Applications -----	C + 25
Patent Disclosures -----	C + 25
Patent Notebooks -----	C + 25
Patent Samples -----	C + 5
Patents - Issued Foreign and US -----	C + Life of Patent
Patrol and Guard Force Reports -----	C
Payment Reports - Payroll -----	C + 4 ***
Payroll Accounting Reports -----	C + 4 ***
Payroll Registers -----	C + 4 ***
Pension Records -----	P
Performance Reviews -----	PF
Permits -----	US/O
Personnel Announcements -----	PF
Petty Cash Records -----	C + 4 ***
Photograph Files - Historical -----	P
Photographs/Layouts -----	U/OBS
Plan Amendment Request Letters -----	US/O
Planning Reports - General -----	C + 5
Plant Protection Records (Security) -----	C + 3

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MEN03175

RECORD SERIES

RETENTION PER

Policies (US) - Liability -----	P
Policies (US) - Property -----	P
Policies and Procedures - Menasha Corp. ----	US/O
Policies/Contracts - Insurance (Employee) ---	AT + 10
Pool Shipping Records -----	C + 1
Position Descriptions -----	US/O
Postage and Postage Meter Records -----	C + 1
Posting Journals (Finance) -----	C + 4 ***
Premium Payment Requests - Insurance -----	C + 1
Prepay & Missing Time Card Lists -----	C + 1
Price Announcements -----	C + 3
Price Audits and Authorities -----	C + 3
Price Lists -----	US/O + 2
Prices and Price Histories -----	C + 5
Pricing Exceptions and Allowances -----	C + 3
Process Control Data -----	C + 2
Process Histories -----	C + 5
Product Claims Support Data -----	U/OBS
Product Complaints and Dispositions -----	C + 3
Product Descriptions -----	US/O
Product Development Data -----	U/OBS
Product (New) Competitive Data -----	U/OBS
Product Safety Studies -----	P
Product Samples -----	C + 3
Product Specifications and Standards -----	C + 3
Production Logs and Reports -----	C + 3
Profit/Loss Statements -----	C + 4
Progress Reports -----	C + 1
Project Cost Reports and Records -----	C + 3
Property Records - Plant and Equipment -----	US/O
Property Insurance - Logs and Reports -----	C + 2
Property Taxes -----	C + 4 ***
Proxy Data -----	P
Publications - Menasha Corporation -----	US/O
Purchase Authorizations -----	C + 3
Purchase Order Registers -----	C + 1
Purchase Orders - Customers -----	C + 6
Purchasing Procedure Manuals -----	US/O
Quality Audit Test Data -----	C + 6
Quality Reports -----	C + 3
Quarterly Reports -----	C
Quotations - to Customers -----	C + 1
Raw Material and Vendor Specifications -----	C + 4
Raw Materials Reports -----	C + 4
Receipts - Record of Miscellaneous -----	C + 1
Receipts for Regular Mail, Express -----	C + 1

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RECORD SERIES

RETENTION PER

Receiving Records - Material/Equipment -----	C + 1
Receiving Records - Property -----	C + 2
Reference Data - Research -----	US/O
Registers - Pension -----	C + 1
Relocation Records (Employee) -----	C + 2
• Rental Agreements - Short Term -----	AT + 1
Research Reports -----	US/O
Research Statistics - Outside -----	US/O
Restrictions - Easements, Permits, etc. -----	US/O
Results of Skill Tests -----	PF
Retirement Trust Reports and Plans -----	C + 2
Royalty Payment Lists -----	AT + 3
Royalty and Fees -----	AT + 3

SEC - Reports -----	P
Safety - Flammability and Toxic Materials ---	C + 25
Safety - SOHA Records -----	C + 20
Safety Guidelines and Rules -----	US/O
Safety Inspections - Routine -----	C + 1
Safety Meeting Minutes -----	C + 10
Safety Product Guarantees - Support Data ---	C + 50
Safety Programs and Plans -----	C + 5
Salary Cards (Payroll) -----	C + 4 ***
Salary and Compensation - Histories -----	PF
Sales Adjustments -----	C + 1
Sales Forecasts -----	C + 1
Sales Manual Changes and Work Sheets -----	US/O
Sales Orders -----	C + 6
Sales Reports -----	C + 2
Sales Tax Exemption Certificate - Customer --	US/O
Sample Files -----	C + 4
Sample Orders -----	C + 4
Samples -----	C + 4
Scholarships -----	C + 5
Scrap Reports -----	C + 2
Securities Owned by Menasha Corporation -----	P
Security Violations/Infractions -----	C + 2
Sewage Treatment Reports -----	C + 3
Shipment Statistics (Freight) -----	C + 1
Shipping Orders/Authorities -----	C + 3
Shipping Records -----	C + 3
Shrinkage Reports - Inventory -----	C + 1
Shutdown Check Lists and Reports -----	C + 1
Sick Pay FICA Report -----	C + 1
Skill Tests -----	PF
Specifications - From Customer -----	C + 6
Specifications (Purchasing) -----	C + 6
Speeches -----	C + 5
Spill Reports - Chemical and Oils -----	P

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RECORD SERIES

RETENTION PERIOD

Standard Inspection Procedures (Quality) ----	US/O
Standard Test Procedures (Quality) -----	US/O
Start-up Check Lists and Reports -----	C
Statistics - Customer Performance -----	US/O
Status Reports (General) -----	C
Steam Records -----	C
Stock Lists (Materials) -----	C
Stockholder Records -----	P
Stop Payment Records -----	C + 4 ***
Subject Files -----	C
Subsidiary Ledgers -----	P
Surplus Equipment Reports -----	C + 1
Surveys - Deeds and Title Data -----	P
Tariffs -----	C + 3
Tax Returns -----	P
Telephone Records -----	C + 3
Testing Requests (Purchasing) -----	C + 1
Time Cards -----	C + 2
Tool Records -----	C + 3
Track Agreements - Side Track, etc. -----	P
Tractor Utilization Cost Records -----	C + 2
Trade Reconciliations -----	C + 3
Trademark Dockets -----	P
Trailer Locators -----	C
Trailer Utilization Reports -----	C + 2
Training and Education Records -----	PF
Trial Balances -----	C + 1
Trip Reports -----	C + 3
Truck Orders -----	C + 1
Unemployment Compensation (US) Records -----	C + 3
Unfair Labor Charges - Labor Relations -----	C + 10
United Parcel Services Orders Shipped -----	C
United Way Deduction Forms -----	PF
Utility Usage Records (Buildings) -----	C
Vacation/Leave Balance Listings -----	C
Value Added Tax -----	C + 1
Values - Insurable Property -----	US/O
Vehicle Condition Reports -----	C
Vendor - Activity Reports -----	C + 1
Vendor - Payment Records -----	C + 1
Vendor Data (Quality) -----	C + 5
Visas -----	PF
Visitors Passes and Registers -----	C + 1
Vouchers - All -----	C + 4 ***

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RECORD SERIES

RETENTION PERIOD

W-2 Verification Lists -----	C + 4 ***
W-2's -----	C + 4 ***
Wage Assignments -----	PF
Warehouse Charges -----	C + 1
Warehousing Contracts -----	AT + 3
Warehousing Insurance Reports -----	C + 1
Warranty Certificates - Customer -----	US/O
Water Rights -----	P
Water Treatment Plant Logs and Tests -----	C + 50
Weight Tickets -----	C + 1
Well Records -----	U/OBS
Withholding Statements -----	C + 7 ***
Work Orders/Requests -----	C + 2
Worker's Comp. - 1st Report -----	C + 3
Worker's Comp. Records -----	R/T + 10
 X-rays - Employee Health -----	 R/T + 10

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